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#### 1.0 Introduction

- 1.1 The Anglesey and Gwynedd Deposit Local Development Plan (LDP) was subject to public consultation for a six week period between the 16<sup>th</sup> February and the 31<sup>st</sup> March 2015. 1700 representations were received during the public consultation.
- 1.2 In accordance with the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005, Regulation 19, a **summary** of the each comment received is now available to view in the form of a Representations Report.

Please note that this is a summary report only. The Councils are not endorsing the representations that are contained in the report or any 'alternative sites' that are referred to in to the representations; they only represent the views of the individuals or organisations who submitted them. The Representation Report is for viewing only and not for comment.

1.3 Responses to the Deposit consultation included a number that related to site allocations or development boundaries shown in the Deposit Plan. These 'Alternative Site' representations were submitted by individuals or organisations who consider that the relevant maps should be amended to: include new allocations, remove existing allocations from the Plan or alter them in some way, change the development boundary, or change the make-up of existing clusters. Therefore the Representations Report is divided into two parts:

PART 1	Representations on the Written Statement – the representations relating to the Strategy and the wording of the various Policies and Paragraphs contained in the Deposit Plan. This section follows the same order as the Deposit Plan.
PART 2	Site Specific Representations – the representations seeking changes to the allocations, development boundaries and clusters in the Deposit Plan. This section follows the same order as the schedule of settlements found in appendix 4 of the Deposit Plan. Settlement maps have been created which show the location of the 'Alternative Sites'.

1.4 If, having read the summary of individual representations, you wish to see the complete representation you can do so by viewing a library containing a hard copy of all representations received located in the Joint Planning Policy Unit (JPPU) Office. Alternatively a hard copy or an electronic copy of full individual representations can be requested in writing by contacting the JPPU:

Post:

Email:

Joint Planning Policy Unit Bangor City Council Offices, Ffordd Gwynedd, Bangor, LL57 1DT planningpolicy@gwynedd.gov.uk

#### 2.0 What Happens Next?

2.1 All the representations received about the Deposit Plan and the evidence submitted in support will be analysed carefully by the JPPU. When the analysis work has been completed a report which will suggest which steps need to be taken will be prepared. This report will be submitted to the Joint Planning Policy Committee in January 2016 in order for it to make a decision on how to respond to the representations.

- 2.2 Once the Joint Planning Policy Committee has agreed on how to respond to the representations, the Deposit Plan, background and topic papers, a consultation report (which will set out a summary of each individual representation and the Councils' response), and all the representations received will be submitted to the Welsh Government and Planning Inspectorate for independent examination in **March 2016**. A Planning Inspector will be appointed to assess all duly made representations and the evidence submitted in support of the representations and any changes proposed by the Councils to decide whether the plan is sound. If the Councils have recommended amendments they will be shown in an Appendix to the Deposit Plan, which will be part of the documents pack submitted to the Planning Inspectorate.
- 2.3 A Public Examination will follow and will include a series of Hearings, which will give the Inspector an opportunity to discuss the main issues with individuals who have made representations about the Deposit Plan. The Inspector could recommend amendments to policy, paragraphs or sites based on the evidence received in support of objections. The Council will be required to consult on any amendments that arise from the Examination before the Inspector completes the binding report.

#### 3.0 Further Information

3.1 For more information in regard to any aspect of the preparation of the Joint Local Development Plan or if you wish to be placed on the JLDP's consultation database, please contact the JPPU via email <a href="mailto:planningpolicy@gwynedd.gov.uk">planningpolicy@gwynedd.gov.uk</a> or by telephone 01286 685003/01766 771000.

## **Section 1: The Executive Summary**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
62	Mr Aled Evans [2646]	1.1	Object	The entire plan is based on government orders rather than local need. It provides for too many houses.  Assessments on a local level of what exactly is the demand, not something based on the government's population projections
163 188	Rod Dixon [2774] Mrs Irene Stott [2780]	1.1	Object	The process for submitting comment seems to have been made excessively difficult and designed for the convenience of the planners and to deter the average person. I consider myself computer literate but it took me considerable effort to sort out the system. I would think this is likely to reduce the number of comments.
391	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	1.2	Support	Ffestiniog Town Council support keeping Blaenau Ffestiniog as a Town Service Centre. This is important in terms of public transportation, local services, and much more.
409	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	1.2	Object	Additional comment. Where houses are built slowly, the Local Plan should encourage people to create one dwelling out of two houses next to each other.
410	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	1.2	Object	Additional comment - It should be ensured that elements of the plan in Blaenau Ffesiniog coincide with the Local Plan that will be created for Snowdonia National Park. What coopoeration exists between Gwynedd Council's Planning Departments and the National Park?
412	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	1.2	Support	Additional comment - The Town Council supports the vision for Blaenau Ffestiniog on page 41.
162 189	Rod Dixon [2774] Mrs Irene Stott [2780]	1.3	Object	The process is undemocratic and, as far as I can see, has been compiled by the planners with no consideration for the population and has not been considered and passed by the local councils - the peoples representatives. Existing policies and planning guidance seem to have been ignored. The Preferred Strategy Document was very generalised and had insufficient detail for constructive comment.  Submit the plan for council approval at full council meetings
272	Mrs Marian Jones [2832]	1.3	Object	Apparently, you have been consulting with the public. Nobody has contacted me nor any member of my family. Have you had contact with a vast percentage of the County's population? And had a cross-section in terms of age and personal circumstances?

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				I believe that the public have not been notified about the plan. Everyone should have the information in full, in a language which is easy to understand. Everyone should be individually interviewed and had an opportunity to voice their opinion. This would give a fairer picture of the local need for housing.
152	Mr Aled Evans	1.4	Object	As noted when responding to the Preferred Strategy - the plan was created from top to bottom, and not from the bottom up as therefore it would be unable to address the real needs of the County, and eventually, the country.
				Commence with the plan by taking local needs into account, adding them together and see what the needs of the country are in its entirety. Respect will be paid to local needs without forgetting the more widespread needs. As it stands, the "great need" surpasses the local need.
271	Iwan Edgar [2833]	1.5	Object	The cart before the horse  Assess the requirements from the bottom up, they are not ordained
356	Mr Aled Evans [2646]	1.9	Object	Give observations  Amend the procedure that you have here which allows anyone to include evidence with the observations.  Unfortunately, as far as I can tell (and like I was told by an officer) the system is faulty.
510	Marian Roberts [2973]	1.11	Object	I am of the opinion that both councils have not shown that the development would not harm the situation of the Welsh language from a community point of view. They do not have evidence which proves that there would be no overdevelopment. We know about the consumptive impact of the migration on the Welsh language on the English villages and towns of the north coastline, and now this has happened, and is happening in front of our eyes here in Gwynedd and Anglesey.
500	Marian Roberts [2973]	1.14	Object	evidence not on a believable basis (Soundness test CE2)      * base a Local Development Plan on local need, forming community development plans to avoid overprovision that could lead to non-Welsh migration;
513	Marian Roberts [2973]	1.13	Object	A sweeping statement like this "The status of the language is very healthy in Botwnnog Y Ffor and Chwilog" (under BOTWNNOG) is without reliable evidence and planning to build 40 houses there is completely irresponsible. (Deposit Plan Linguistic Impact Assessment, February 2015)
514	Marian Roberts [2973]	1.13	Object	The publicity regarding the consultation was very limited:  * No mention in "Newyddion Gwynedd" which is sent to every household and office in December and March and not with the council tax bill that was sent a while before the consultation ended.  * Obtaining paper copies of the documents to study would have set people back hundreds of pounds.  * The public drop in sessions were limited with little publicity surrounding them.
140	Cyngor	1.17	Object	The first sentence states: "The Examination ensures that the Plan is based on sound information and

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]			thinking and that the views of those with concerns about the Plan have been considered." As far as we can see there is no evidence that amendments suggested by us that is Llanystumdwy Community council (and other organisations) in May/ June 2013 have been considered.
351	Cymdeithas yr laith Gymraeg (Menna Machreth) [2819]	1.17	Object	We believe that several of the soundness tests are flawed. C1: we believe that the plan undermines Gwynedd's Language Policy 2014-17 C2: the Welsh Government Planning Bill is currently being formed therefore it would be unwise to make a decision without considering the principles of that bill C4: a local needs assessment has not been undertaken CE2: There is no evidence in the plan to show how the number of houses was decided upon for each community. There is no evidence to prove that the plan would not have a detrimental impact on the Welsh language CE4: it is not flexible to deal with changing circumstances
820	Jina Gwyrfai [3092]	1.20	Object	This Plan has been presented to the residents of Gwynedd and Ynys Mon in a way that is surely incomprehensible to the majority. The provision of a 'summary' - glossy & misleading has further hidden the major problems/ flaws in the whole plan, i.e.  * insufficient emphasis on the opportunities arising from the existing housing stock;  * lack of sufficient evidence locally that housing is needed, e.g. can the need for 323 houses in Pwllheli be justified;  * detrimental impact of migration.  There needs to be firm statistical evidence for the need for new homes, not influenced by profitability for builders and migration figures.
77	Cyngor Cymuned Y Felinheli (Cyng Sian Gwenllian) [2683]	1.22	Support	We agree with the designation for Felinheli and warmly welcome it. The Local Market policy could be relevant to Bangor's side of the ward, but could prevent people from other parts of Gwynedd e.g. Llyn, Meirionnydd from constructing windfall sites. At present, therefore, we do not wish to be included under 'Open Market' but will keep an eye on the situation if we feel as though we need the additional cover for the future. We are also pleased that only 100% affordable housing would be able to be built according to local need on the village's outskirts.
114	CPERA (Cynghorydd Elin Walker Jones) [2760]	1.26	Object	Need to collaborate and carefully plan on the needs of the people of Bangor, establish a committee to look at the housing needs of the people of Bangor, look at relocating the city's boundaries? Need for affordable housing, robust infrastructure. Brownfield! - not greenfield, consider impact on the Welsh language
287	Mr John Hughes [2676]	1.26	Object	1.28 Table 1 Clusters. Llanengan has been recategorised as a cluster, while Sarn Bach and Llangian as rural villages. Why? Llanengan is the District name (Plwy Llanenga) larger and more active than both other, community center, ysgol feithrin, snooker, Church and a Pub (Hub). A very Welsh living village.
393	Cyngor Tref Ffestiniog (Mrs	1.26	Support	Ffestiniog Town Council is keeping Blaenau Ffestiniog as a Town Service Centre. This is important in terms of public transport, local services and much more.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Ann Coxon) [2940]			
418	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	1.26	Object	It should be ensured that elements of the plan in Blaenau Ffestiniog correspond with the Local Plan that will be created for Snowdonia National Park. What cooperation exists between Gwynedd Council's Planning Departments and the National Park?
419	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	1.26	Object	Additional comment - Where houses are slowly sold, the Local Plan should encourage people to create one dwelling out of two houses next door to each other.
631	Cyng./Counc Mike Stevens [406]	1.26	Object	For the long term sustainability of Gwynedd, it cannot be beneficial that all the urban service centres are in the north of the county. Tywyn is regarded as the 'Mother Town' of South Meirionnydd servicing six large villages who look to Tywyn for their major services. A new x-ray department in the hospital and a new police and fire station are currently being built. Health authorities recognise the geographical importance of Tywyn. Tywyn should be designated as an Urban Centre equal to the current four in Gwynedd to allow the growth in housing and jobs retain local people.
142	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	1.27	Object	The figures in this paragraph are fraudulent. It is stated "facilitate the provision of 7,184 new homes." When a slippage of 10% is added the figure is 7,902. It is stated that about 50% have been built or with planning consent "which means that an additional 3,907 new homes." 50% of 7,902 is 3,951 that equates to an additional estate somewhere.
217	Home Builders Federation Ltd (Mr Mark Harris) [1470]	1.27	Object	Explain why the housing figure has been reduced from the preferred strategy figure.  Concern on over reliance on existing historical planning consents and whether or not these will really deliver houses.  Amend housing figure number to 7665. Ensure sites which have previous consents have been properly assess for deliver-ability.
218	Home Builders Federation Ltd (Mr Mark Harris) [1470]	1.27	Object	The housing figure does not appear to allow for a 4% vacancy rate which is required to allow the housing market to operate. Concern raised at the reliance on existing planning consents which have not delivered to date.  Amend housing figure to 7471.
346	Mr Gareth Dobson [2917]	1.27	Object	There is no evidence of the need for the number of housing noted within the plan. Indeed, it is arguable that the number of housing that has already been allocated within Gwynedd's local development plan is sufficient. Gwynedd and Anglesey County Councils are Welsh language communities and development of this scale would surely negatively impact the Welshness of these communities, especially in the local

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				service centres as they have been described.
815	Mr Iwan Edgar [251]	1.27	Object	The number of houses proposed is more than is required for local need and is likely to promote in- migration of non- Welsh speakers, which will undermine the language in its stronghold. The Deposit Plan expresses support of the language, but by an over provision of housing that support is ineffective and misleading.
				The Hierarchy
153	Mr Aled Evans [2646]	1.28	Object	Change it so that there is a higher percentage in the clusters and in the countryside. The countryside will perish like this. Several people in the countryside want to build their own houses but this procedure is overly centralised.
337	Sally Baxter (Ms Sally Baxter) [2883]	1.28	Support	The Health Board recognises the need for development of appropriate housing to ensure inclusive, healthy communities for the anticipated population needs. We do not have specific objections to the development proposals. We would however wish to be involved in further impact assessment on population health of proposals and also the impact on healthcare provision, given challenges to recruitment, especially in the rural areas, and including Welsh language service provision.
78	Cyngor Cymuned Y Felinheli (Cyng Sian Gwenllian) [2683]	1.32	Support	We support the affordable housing policy.
143	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	1.32	Object	It is stated in the first point "Safeguarding and enhancing the Welsh language - by creating the right circumstances that will contribute to maintaining and creating Welsh speaking communities, e.g. facilitating a mixture of housing, employment opportunities, community services and facilities." We don't see anything in the document that explains how this will happen, - employment opportunities should have more emphasis than housing. Housing should follow employment.
154	Mr Aled Evans [2646]	1.32	Object	The Policies - to safeguard the Welsh language  Prioritise creating and getting work in the area as a first point of call, before building more houses that could be unnecessary - which in turn would attract retired people which would in due course be costly to the county's social and health services. It is okay to build houses where the need has been (roughly) measured beforehand.
335	Miss Ffion Jones [2856]	1.32	Object	I believe that the Plan is much too large for local needs. Yes, housing is required, but more research needs to be undertaken in terms of asking local people about their needs.
1098	Horizon Nuclear Power (Miss Sarah	1.32	Object	Horizon considers the snapshot of the section on "Supporting the energy sector" is unduly restrictive. It is not credible that in each case for energy development effects will be able to be avoided. Support for development of energy projects should be supported where any significant adverse effects have been

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Fox) [2919]			appropriately avoided, remedied or mitigated to acceptable levels.
141	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	1.33	Object	It is stated here: "the required annual monitoring (and) a full review (in) 4 years". By the time the Plan is adopted in December 2016 it will have been operational for 5 years without any monitoring or review.
155	Mr Aled Evans [2646]	1.33	Support	Monitoring

### **Section 2: Introduction**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
422	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	2.4	Object	It should be ensured that elements of the plan in Blaenau Ffestiniog correspond with the Local Plan that will be created for Snowdonia National Park. What cooperation exists between Gwynedd Council's Planning Departments and the National Park?
139	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	2.7	Object	This paragraph states "The matters that are important to the area must be examined, based on evidence." We have collected evidence based on the facts presented in the Llanysumdwy Community Council Area Housing Needs Report (December 2014).
156	Mr Aled Evans [2646]	2.7	Object	The plan's robustness and evidence  The evidence submitted is very vague, repetitive and based on government wishes at times.
157	Mr Aled Evans [2646]	2.8	Object	Bring the plan together  Change the plan so that local needs have priority above the national "needs" / aspirations.
360	Cymdeithas yr laith Gymraeg (Menna	2.12	Object	Evidence for the number of housing in every community is flawed. The plan does not show that a local need assessment has been undertaken. There is no evidence in the Plan to justify the claim that the Joint Local Development Plan would not have a detrimental impact on the Welsh language

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Machreth) [2819]			
384	Mr Gareth Dobson [2917]	2.14	Object	I believe that the Preferred Strategy Scheme, which serves as a basis for the Deposit Plan is flawed. A development pattern should be established based on community need and good practice urban planning guidelines, not for private benefit as arises when an invitation is extended to private developers and when land owners bring land to the authority's attention.

# Section 3: Policy Context (National, Regional and Local)

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
158	Mr Aled Evans [2646]	3.1	Object	Regional and National Policies  More emphasis on the local rather than regional and national
854	Barton Willmore (Mr Mark Roberts) [1645]	3.2	Object	We note that paragraph 3.2 provides a broad summary of Planning Policy Wales (PPW) (July 2014 - Edition 7). Whilst we appreciate that summarising PPW and its TANs is an impossible feat within 2 paragraphs, we are concerned that no reference is made to the overall objective of the Welsh Government and PPW which is to deliver sustainable development and which within Section 4.2 is set out to provide within the plan making and decision making process, a presumption in favour of sustainable development.
819	Jina Gwyrfai [3092]	3.5	Object	The Deposit Plan does not deliver the vision of the Wales Spatial Plan for the areas of Snowdonia and Anglesey namely to "sustain an economythat will assist the area in retaining its unique characterto sustain the Welsh language" because the plans are based on inward migration which undermines the area's unique character and language. The "Population and Household Forecasts" theory uses a methodology which is based on consistent growth in inward migration and this is changing the character of our area. Also, its methodology is not sufficiently linked with Gwynedd (App A A.5). A Feasibility Study on the need for housing according to natural growth only - namely a "Natural Change" model only and to couple it with empty houses and second homes in the County.
1099 1100 1101	Horizon Nuclear Power (Miss Sarah Fox) [2919]	3.7, 3.8 & 3.9	Object	Horizon considers the clarity of these paragraphs could be improved, particularly the legal distinction in the Planning Act 2008 of the term "associated development" as it applies to Wales. The list of bullets illustrating types of associated development should be made consistent with the Wylfa SPG content. Minor errors in the description of the Wylfa Site NSIP regime should also be corrected.
297	North Wales	3.10	Object	Given the emphasis given to protecting biodiversity reference should be made to the Local Biodiversity

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Wildlife Trust (Mr Chris Wynne) [2626]			Action Plans for Gwynedd and Anglesey
1081	Welsh Government (Mr Mark Newey) [1561]	3.10	Object	Table 5 - refers to priorities of the Taith and TraCC Regional Transport Plans. These Plans are to be replaced by the North Wales Joint Local Transport Plan and the Mid Wales Joint Local Transport Plan. The plans should make reference to any committed highway improvements where relevant.
1095	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	Table 5: The Policy Context	Object	NRW recommends that Table 5 includes reference to National Planning Policies including Planning Policy Wales and Technical Advice Notes.

# Section 4: Spatial Profile and Key Issues

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
79	Cyngor Cymuned Y Felinheli (Cyng. Sian Gwenllian) [2683]	4.7	Support	We agree with the main issues that have been identified.
269	Mr Aled Evans [2646]	4.7	Object	K1 does not discuss the movement of people who were born outside of Wales which adds to the numbers of older people in the area. Some acknowledgement should be made of this, given that the area as it stands is being sold as a leisure area (Golf, Sailing) - a good place to retire.
298	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	4.7	Support	KI 24-29 are welcomed
350	WYG/Alliance	4.7	Support	Our Client, Admiral Taverns, supports KI6. The plan must address the insufficient supply, mix

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Planning (Mr Mark Walton) [2905]			and range of housing in rural areas of Gwynedd to support the social and cultural fabric of the area and contribute to the delivery of the economic objectives of the Plan.
445	Bourne Leisure Ltd [2768]	4.7	Object	KI22 should be expanded to reference the need for continued redevelopment/reconfiguration of holiday accommodation in order to maintain a product that meets visitors' expectations. Bourne Leisure is disappointed that the text at paragraph 7.60 of the Preferred Strategy has been omitted from the Spatial Profile section of the Deposit LDP. This text provides useful context with respect of the importance of tourism as an economic contributor and how it consequentially shapes the Spatial Vision and Key Issues.
850	Mr Rob Booth [3033]	4.7	Object	Key Issues10 will not benefit communities and it will result in a decrease in facilities for the local community, especially communities with an aging population. It will lead to a greater number of people requiring to travel and more car journeys. It conflicts with Key Issue 11 "Promote opportunities for people to live healthy lives and have reasonable health care, especially in a healthy population". It is also not appropriate for one of the strategic policies under PS5 on p.75 point 4 "Promote greater self-containment of centres and villages by contributing to balanced communities that are supported by sufficient services"
851	Mr Rob Booth [3033]	4.7	Object	Key Issue 20 is the decline in the prosperity and vitality of town centres. This has occurred due to large supermarkets and business parks being built out of town centres. Out of town shops and offices encourage the use of cars. I suggest a policy that favours retaining shops and business in town centres and does not increase the development of business parks and supermarkets outside of towns and villages.
908	Mr Rob Booth [3033]	4.7	Object	Page 37. Key Issue 20 is the decline in the prosperity and vitality of town centres. This has occurred due to large supermarkets and business parks being built out of town centres. Out of town shops and offices encourage the use of cars. I suggest a policy that favours retaining shops and businesses in town centres and does not increase the development of business parks and supermarkets outside of towns and villages.
1089	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	4.7	Support	NRW considers that the identification and review of key trends brought to the fore by the review of the strategies, plans and programmes identified in Chapter 3 has successfully identified the main issues that are to be tackled by the Joint LDP.
1406	Admiral Taverns	4.7	Support	Support KI6 - Our clients support the premise that the Deposit Joint LDP must deliver a

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[3348]			sufficient and appropriate range and mix of deliverable housing in sustainable locations to meet the housing requirements of all sections of the population, support the social and cultural fabric of the area and contribute to the delivery of the economic objectives of the Plan.
1450	Bourne Leisure Ltd [2768]	4.7	Object	KI22 should be expanded to reference the need for continued redevelopment/ reconfiguration of holiday accommodation in order to maintain a product that meets visitors' expectations. Significant investment is required to maintain ad enhance the viability and attractiveness of existing operations as a destination, to improve their offer and to respond to changing markets, including the improvement of guest facilities and sport an leisure areas. KI22 should be amended to read: "Manage, improve and enhance the 'all year' tourist provision in the area in a sustainable way whilst at the same time promoting the heritage, the Welsh language and Welsh culture of the area.""
1451	Bourne Leisure Ltd [2768]	4.7	Object	Bourne Leisure is disappointed that the text at paragraph 7.60 of the Preferred Strategy has been omitted from the Spatial Profile section of the Deposit LDP. This text provides useful context with respect of the importance of tourism as an economic contributor and how it consequentially shapes the Spatial Vision and Key Issues. The text stated: "Tourism brings over £233 million into Anglesey's local economy and over £851 million into Gwynedd (including Snowdonia National Park) each year and supports over 4,000 and 15,819 local jobs, respectively".  Bourne Leisure requests that the above text is reinstated in to the emerging LDP.

# **Section 5: Vision and Strategic Objectives**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
138	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	5.2	Object	It is stated "This is its vision: "Strengthen communities in Gwynedd and Anglesey." We disagree with this statement as the Plan will not strengthen rural communities and the countryside.
160	Mr Aled Evans [2646]	5.2	Object	Vision to strengthen communities  Change the allocation, and reduce the number of houses

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1103	Horizon Nuclear Power (Miss Sarah Fox) [2919]	5.4	Object	There is a lack of overt support in the JLDP for the Wylfa Newydd Project. Whilst the consideration for a Wylfa Newydd related development policy is recognised (in the form of PS9) it is not clear enough and does not in its current form alone enable a coherent decision making framework for associated development. Additionally the lack of clear statements in support of the Wylfa Newydd Project is not consistent with Wylfa SPG.
357	Mr Gareth Dobson [2917]	5.5	Object	There is a significant risk when basing a vision on one project that is yet to be confirmed. Historically, Wylfa or Trawsfynydd did not have a positive impact on those communities near to them - such as Amlwch in Anglesey or Ffestiniog in Gwynedd. In truth, it is arguable that both projects have hindered more suitable developments for the local communities, due to risks involving Nuclear energy.
115	Home Builders Federation Ltd (Mr Mark Harris) [1470]	5.6	Object	A stronger reference to private housing is required, its needs to be more than just the housing needs of the community. New housing is needed to serve the planned economic growth and this will bring new people into the area.  Either amend wording to bullet no. 6 or add a new bullet point.
136	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	5.6	Object	This statement is welcomed but shouldn't the Development Plan define how this objective will be achieved. There should be more details about how this objective will be achieved.
270	Mr Aled Evans [2646]	5.6	Support	Vision (agree but uncertain about how things will work)
300	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	5.6	Object	The opening paragraph of the vision should emphasis the natural environment as elsewhere in the document. Insert the word "natural" before environment
379	Mr Gareth Dobson [2917]	5.6	Object	The vision is too ambiguous - full of adjectives but not much basis. There is not enough evidence of the Authority's ability to achieve the vision in its current form.
849	Mr Rob Booth [3033]	5.6	Object	It is very disappointing to see that Gwynedd and Anglesey Council have a vision that includes a new nuclear power station, which has great risks as we have seen in the recent disaster at Fukushima. A new power station would need many major associated developments such as housing for the construction workers and infrastructure (e.g. roads, pipers and pylons). The building of the nuclear power station will affect the Welsh culture due to the influx of temporary

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				construction workers. Nuclear power is not sustainable, it requires toxic fuel and the waste is very problematic.
858	Barton Willmore (Mr Mark Roberts) [1645]	5.6	Object	The vision is broadly positively prepared and provides a good exposition of what the Plan seeks to achieve generally and within specific areas of Anglesey and Gwynedd. However, we are concerned that there is no reference to delivering sustainable development and the presumption in favour of sustainable development within the Vision, a cornerstone of Planning Policy Wales.
1104	Horizon Nuclear Power (Miss Sarah Fox) [2919]	5.6	Object	To give due prominence of the Wylfa Newydd Project, Horizon considers the Project should be reflected in the Vision.
323	Sally Baxter (Ms Sally Baxter) [2883]	5.7	Object	The approach to link objectives to the Single Integrated Plan is welcomed. However, the LDP objectives do not sufficiently reflect the SIP objective of inclusive communities where residents enjoy good health and well-being. It would be helpful to emphasis this within the objectives.
116	Home Builders Federation Ltd (Mr Mark Harris) [1470]	5.8	Object	Under theme 3 reference should be made for the need to provide adequate and suitable housing to support the economic growth of the area. The plan housing targets are based on economic growth and vice versa so better cross reference to this needs to be made in the wording of the document.  Add a Strategic Objective which states:
134	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	5.8	Object	Adequate and suitable housing will be provided to support the economic growth of the area.  Another of the Plan's strategic objectives is "To give everyone access to a home appropriate to their needs." We agree but what about existing empty houses. As far as we can see the intention is to create uniform estates and over-centralise in a few places rather than support natural development that responds to local needs. These estates are at the expense of development in the countryside, and the comments made under the "Population, Demographic and Housing" heading (page 35/36) that is KI.1 and KI.5 and KI.33 are supported.
135	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	5.8	Object	It is stated that this Plan's strategic aim is to "Maintain and create safe, healthy and active communities." According to our evidence (Housing Needs Report Llanystumdwy Community Council) 61.4% can't afford to buy a house. The only movement required is from a large house to a smaller one or large family to a larger house. By building 40 houses in Chwilog only a few local people could afford to buy them. Who therefore would be moving to them as there are no employment opportunities here? It is therefore likely that older people would go there, and this

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				would not create an active community.
276	Mr Aled Evans [2646]	5.8	Support	Strategic Objectives
301	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	5.8	Object	SO 16 covers a very broad range of issues; greater clarity would be achieved by separating these issues into different objectives. Natural and heritage assets should be separated to reflect the intrinsic value of the natural environment.  Replace SO 16 with two objectives  1. Protect, enhance and manage the natural assets of the Plan area, including its natural resources, wildlife habitats and its landscape character  2. Protect, enhance and manage the heritage assets of the Plan area and its landscape
				character and historic environment.
306	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	5.8	Object	Greater emphasis should be given to the protection of international and national sites in the key outputs of theme 5. Add "or damage to any of their features".
349	WYG/Alliance Planning (Mr Mark Walton) [2905]	5.8	Support	Our Client Admiral Taverns supports the strategic objective of SO14 and SO15 to deliver a sufficient and appropriate range and mix of deliverable housing sites in sustainable locations to meet the housing requirements of all sections of the population.
855	Barton Willmore (Mr Mark Roberts) [1645]	5.8	Object	There is not one overarching objective of delivering sustainable development. Planning Policy Wales (paragraph 3.1.2 and 4.2), provides a presumption in favour of sustainable development and this is at the heart of the plan making and decision taking approach of the Welsh Government. This is explained within Section 4.2 of PPW and particularly, paragraph 4.2.2. This is a very significant oversight, and on review of the policies of the Plan it is clear that the Plan does not embody the approach of the Welsh Government set out in PPW of the presumption in favour of sustainable development and Positive Planning. The presumption in favour of sustainable development should be embodied throughout the Plan.
871	Friends of Borth-y Gest (Tom Brooks) [3036]	5.8	Support	The aims and objectives of the Friends of Borth y Gest include:  "to seek to preserve the special nature of the area as a peaceful pretty seaside village set in an outstandingly beautiful rural setting". In this regard we applaud Theme 1 of the Written

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Statement - support and create safe, healthy, distinctive and vibrant communities, and Theme 5 - protect and enhance the natural and built environment.
1090	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	5.8	Support	It is considered that the Plans' series of Strategic Objectives set out in section 5.8 will help ensure that the Plans' vision is realised and also sets out the context for the Strategic Policies and Detailed Policies to be based upon.
1097	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	5.8	Support	It is acknowledged that Strategic Objective Theme 5 now also includes the need to protect, enhance and manage natural resources.
1105	Horizon Nuclear Power (Miss Sarah Fox) [2919]	5.8	Object	Horizon considers that it would be appropriate to include a new strategic objective under Theme 3 which supports the development of the Wylfa Newydd Project to ensure the JLDP contains a coherent policy framework for managing the Wylfa Newydd Project. Please also see the accompanying "Proposed Wylfa Newydd policy framework" which has been prepared to show the Wylfa Newydd specific policy framework as a whole.
1111	Horizon Nuclear Power (Miss Sarah Fox) [2919]	5.8	Object	It is stated to be a key output that "no development given planning permissions will have resulted in a loss of a site of international or national nature conservation value". This wording is unduly rigid. For example the Tre'r Gof SSSI is located within the Wylfa NPS Site boundary and IACC is aware of the potential for the construction of the Wylfa Newydd Project to adversely affect it. The output sought does not allow sufficient flexibility for changes in circumstance and does not acknowledge that there is a process whereby SSSIs can be denotified.
1407	Admiral Taverns [3348]	5.8	Support	SO14 & SO15 - Our clients support the premise that the Deposit Joint LDP must deliver a sufficient and appropriate range and mix of deliverable housing in sustainable locations to meet the housing requirements of all sections of the population, support the social and cultural fabric of the area and contribute to the delivery of the economic objectives of the Plan.

**Section 6: The Strategy** 

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
67	Cyngor Cymuned Llanddyfnan (Mr Graham Owen) [1378]	6.1	Object	The members also propose that Gwynedd and Anglesey councils go back to the beginning with the Joint Local Development Plan, and seriously reconsider the proposals.
216	PAWB (Robat Idris) [2814]	6.1	Object	The Plan's precedent is flawed, as it presumes that the Wylfa B nuclear station will be built. As the strategy is flawed, the whole Plan is invalid. It is considered that the failure to build the Hinckley power station is an indicator that Wylfa B won't be built. Reference is made to the difficulties associated with getting rid of waste safely. In addition reference is made to trends to rely less on a few large providers, looking at addressing needs locally, investments in renewable energy and methods of reducing the demand for energy. Due to the uncertainty about the power station's future two plans should be formed: one to deal with a power station and the other to deal with a scenario minus a power station. This would avoid an excessive amount of housing being given consent in Anglesey, which would have a detrimental impact on the local communities.
863	Bangor Civic Society (Don Mathew) [2988]	6.1	Object	We believe that the Plan needs to highlight key topics:  * aging population: this is multi facetted and it is difficult to gather a holistic approach from the Plan;  * children and young people - as above;  * disabled people - as above. Wales has a higher proportion of disabled people than other nations & regions of the UK and in 2010 the Welsh Government stated that disability levels (under the DDA) were one-fifth of the working population;  * poverty alleviation - another area where Wales is under-performing & which should be central to the Plan's purpose.
1003	Cyngor Sir Ceredigion (Mrs Llinos Quelch) [1286]	6.1	Support	Having considered the Gwynedd and Anglesey Deposit LDP strategy and policies, Ceredigion County Council do not believe there is any specific policies or issues we need to comment on. The proposed strategy is broadly comparable to the Ceredigion LDP with a settlement hierarchy reflecting ours and a strategy of affordable housing contributions on a sliding scale. The deposit LDP would have no detrimental impact or conflict with the Ceredigion LDP strategy and policies and vice versa, therefore we welcome the proposed draft
848	Mr Rob Booth [3033]	6.3	Object	On page 46 in table 8 one of the main elements of the strategy is economic growth. Economic growth is not sustainable. I suggest that the main strategy should seek to maintain economic

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				status.
133	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	6.4	Object	We support the comment "promote prosperous and sustainable communities that support local services including the provision of additional housing and related development proportionate to local requirement." The conclusions of the "Housing Need Assessment of Llanystumdwy Community Council" are commensurate with local need and confirms there is no need for the type of development proposed for Chwilog in the Deposit Plan.
128	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	6.5	Object	It is stated "It sets a level of growth considered to represent the most robust, balanced and appropriate approach taking into account all relevant factors, including work undertaken by independent housing and economic forecasts." We disagree, again on the basis of the Housing Needs Report for the Llanystumdwy Community Council Area.
278	Mr Aled Evans [2646]	6.5	Object	Strategy  The evidence I have seen does not support the propositions here.
834	Cyngor Cymuned Tudweiliog (Mrs Glenys Peters) [1236]	6.8	Object	Villages not included on the list should be considered in accordance with local need.
1029	Welsh Government (Mr Mark Newey) [1561]	6.8	Object	Further justification is required to explain the number of villages included within this policy. Some of these clusters have scored very low in the sustainability matrix included in topic paper 5 (Developing the Settlement Hierarchy). The lower scores suggest that these are less sustainable, isolated developments, and not well connected to services and facilities, hence the need to explain why these have been identified. The Welsh Government objects to the identification of so many 'clusters' which lack justification.
403	Welsh Highland Railway (Mr Graham Farr) [254]	6.10	Support	Support.
1093	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521] North Wales	6.10	Support	NRW is satisfied with the strategy's aim to disperse development proportionately around the plan area. The focus being on locating development within those locations that provide the best opportunity for achieving sustainable development i.e. developing the Sub regional, urban and local service centres, and an appropriate amount of development in villages with a focus on service villages and then some development in Clusters.  The last sentence should emphasis the themes elsewhere in the plan of protecting the natural

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	
	Wildlife Trust (Mr Chris Wynne) [2626]			environment. Replace the word "countryside" in the last sentence with "natural environment".	
856	Barton Willmore (Mr Mark Roberts) [1645]	6.13	Object	Paragraph 6.13 refers to the Urban Capacity Study of the Centres which looked to reuse where possible and as a priority suitable developed brownfield land.  However, this study was solely confined to existing urban centres. It ignored, the large derelict, decaying and contaminated former Dynamic Friction Site. However, in sustainability terms the site is located in close proximity to Caernarfon. Is well served by existing bus routes and a 5 minute journey to the bus station and connected to Caernarfon by a good quality cycle route a 10 minute cycle. There is also a pavement from the site to Caernarfon. The site is previously developed land, contaminated and occupied by a substantial concrete and steel structure that dominates the site and the wider surrounding area - see site specific objections.	
1674	Welsh Government (Mr Mark Newey) [1561]	6.14	Object	Site Assessment Methodology - For this assessment to be effective, the authorities will need to clarify exactly how much of the site is BMV and how it has influenced decisions regarding uses on such lands.	
404	Welsh Highland Railway (Mr Graham Farr) [254]	6.17	Support	Para 6.17. The Company does not wish to see extended the development boundary on the northern side of Porthmadog.	
1112	Horizon Nuclear Power (Miss Sarah Fox) [2919]	6.19	Object	Refers to "Habitats Regulation Appraisal" which is a typographical error and should refer to "Habitats Regulation Assessment" ("HRA"). In any event this text should be clear as to what steps of HRA have been undertaken (i.e. screening, appropriate assessment etc.).	
873	Friends of Borth-y Gest (Tom Brooks) [3036]	6.20	Object	The supportive text to 6.20 is noted and support the drawing of development boundaries tight up to the actual edge of settlements. Our objection seeks modification to provide clarification and consistency in the plan. We are concerned that the definition of development boundaries refers to "sub regional Centre, Urban Service Centre, Local Service Centres and villages". We note that in the formal policies of the written statement there is no category called villages, but categories called "local villages" and "coastal/ rural villages". The text would benefit from clarifying that the development boundaries apply to all of these villages.	
909	Tom Brooks [3034]	6.20	Object	I support the drawing of development boundaries tight up to the actual edge of settlement construction. This objection seeks modification to provide clarification and consistency in the plan. I am concerned that the definition of development boundaries refers to "Sub-Regional"	

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	
				Centre, Urban Service Centre, Local Services Centres and villages". I note that in the formal policies of the written statement there is no category called villages but categories called "local villages" and "coastal/ rural villages". For avoidance of doubt, the text would benefit from clarifying that development boundaries apply to all of these categories of villages.	
1434 1455	Cyngor Tref Penrhyddeudraeth (Mr Glyn Roberts) [1261] Cyng/Counc Gareth Thomas [402]	6.24	Object	The proposed strategies and proposals aren't based on a credible evidence base in accordance with Test of Soundness CE2. There are inconsistencies and contradictions are an inability to realise the significance of the statistics. There are statements in the Language Impact Assessment about Penrhyndeudraeth that are absolutely astray. Also where refere is made to the proportion of Penrhyndeudraeth's residents able to speak Welsh, the third bullet point states that 74.8% are able to, which is 4.8% higher than the threshold, but in the Conclusions section it is noted that the percentages are as follows, 76.5% and 6.5%. Which correct?	
1429	Cyngor Tref Penrhyddeudraeth (Mr Glyn Roberts) [1261]	6.25	Object	The planning culture insists that species of creatures and plants that have been under siege and some types of buildings have to be treated with care and respect in case of further damage by building and engineering plans etc. In complete contrast, the planning regime is prevented from giving the same consideration and respect to the Welsh language. Although it also is under heavy siege and retreating, it is forced outside the planning culture. It should be included within the planning culture and defended by statutory means. With this in mind, house building should be according to the needs of our communities only not according to the projections system.	
1436	Cyng/Counc Gareth Thomas [402]	6.25	Object	There is a feeling that the Welsh language is under heavy siege and under retreat, and there is a feeling that the planning procedure and culture doesn't consider it important. With this in mind, house building should only address the needs of our local communities and not in accordance with the projections system, which conflicts with this.	
1113	Horizon Nuclear Power (Miss Sarah Fox) [2919]	6.26	Object	There is insufficient support for the Wylfa Newydd Project in the Plan. Support for the Wylfa Newydd Project, as the biggest driver of the economic transformation sought, should be included within these paragraphs.	
1114	Horizon Nuclear Power (Miss Sarah Fox) [2919]	6.28	Object	There is insufficient support for the Wylfa Newydd Project in the Plan. Support for the Wylfa Newydd Project, as the biggest driver of the economic transformation sought, should be included within these paragraphs.	
203	John Brinley Jones [2087]	6.31	Object	It is also vital that business owners that create employment and wealth in the area are encouraged to move into the area or if they require a home in the area and have a plot that they should not be subjected to very stringent affordable sized dwellings since they may	

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				require additional facilities within their homes such as office space or areas where they could work from home.
				To consider each planning application on merit rather than have a blanket policy that obviously can't meet all requirements.
				To consider each planning application on merit rather than have a blanket policy that obviously can't meet all requirements.
214	Home Builders Federation Ltd (Mr Mark Harris) [1470]	6.40	Object	It is not considered clear why the housing figure has been chosen as it does not fit with any of the scenarios tested (a point stated in the Councils own documents). The figure does also not appear to include a 4% vacancy rate allowance which is required for the normal operation of the housing market. Also the figure for Gwynedd is below the 2011 projection figure which goes against the advice of Carl Sargeant AM who advises they should be the starting point.  Further clarification required on the option chosen. Increase the housing requirement figure to
				7471 to take account of the 4% vacancy rate. Explain why the Gwynedd housing requirement is below the 2011 Housing projection figure.
117	Home Builders Federation Ltd (Mr Mark Harris)	6.41	Object	No reference is made to an allowance for empty properties. It is generally been accepted at recent LDP's that a 4% allowance should be made for this, as the market needs a certain level of empty properties to operate. There is however a difference between long term empty properties which can be addressed by a Council policy and short term vacancies.
	[1470]			Include reference to empty properties and vacancy rates and increase housing number to 8189.
293	Home Builders Federation Ltd (Mr Mark Harris) [1470]	6.42	Object	The HBF believe that more of the housing requirement should be provided by the Subregional and the Urban Service Centres. As this would make the plan more sustainable and respond to market demand. Increase the number of houses provided in the Sub-regional and the Urban Service Centres. This can be done by allocating more sites which would also provide the additional number suggested in comments on other parts of the plan.
118	Home Builders Federation Ltd (Mr Mark Harris) [1470]	6.43	Object	Concern is raised at the heavy reliance on previous consented sites. Many of these have had consent for some time and there may be reasons other than the market why these have not delivered. Has any assessment of the likely hood of these to deliver have been made. This is backed up by this year's JHLAS for each area which identified a number of sites which had

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	
				been in over 5 years and many more that had proved a start on site to keep the consent alive or just renewed the consent.  Reduce the reliance on existing consented sites and allocate more new sites which can be proved to be deliverable.	
896	Barton Willmore (Mr Mark Roberts) [1645]	6.43	Object	Paragraph 6.43 confirms that approximately 50% of the housing requirement is to be provided via existing commitments and planning permissions. However, there is no certainty that all those permissions and commitments will be delivered. Many planning permissions and existing commitments are not delivered for a wide range of reasons including third party land, access, site constraints, land value, lack of market, restrictive S106 agreement requirements etc. Information about each site should be provided and each site should be assessed not simply rolled forward as a commitment on an unquestioned basis. It is also unclear what level of housing committed and proposed will be on greenfield and previously developed sites.	
204	John Brinley Jones [2087]	6.45	Object	It is vital that business owners that create employment and wealth in the area are encouraged to move into the area or if they require a home in the area and have a plot that they should not be subjected to very stringent affordable sized dwellings since they may require additional facilities within their homes such as office space or areas where they could work from home.  To consider each planning application on merit rather than have a blanket policy that obviously can't meet all requirements.	

## **Section 7: Managing Growth and Development**

## 7.1 - Safe, Healthy and Vibrant Communities

### Welsh Language and Culture

### PS1 – Welsh Language and Culture

	Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
Ī	763	Campaign for the	7.1.1	Object	CPRW agrees that support to communities should be given emphasis, including in particular primacy

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Protection of Rural Wales (Mr Noel Davey) [1169]			to policies to preserve and promote Welsh language and culture. CPRW is concerned that most of the other 'community' policies covered relate to the provision of physical infrastructure including roads. Whilst these are relevant they do not address a perception that a trend towards greater centralisation of planning policies and decisions is reducing the influence small rural communities have over their local living conditions and development, that genuine local consultation is weak and that local representation through community councils is ineffective. More attention is required to mechanisms for increasing the influence of small rural communities over their living conditions and development.
72	Cyngor Tref Nefyn (Liz Saville Roberts) [2710]	PS1	Support	It is approved that PS1 noted that it is possible to refuse proposals based on their potential to cause significant harm to the character and balance of a community's language. The results of the 2011 Census regarding changes in a community's language profile should be considered as evidence when coming to an opinion about proposals' potential to change linguistic character. An impact on Welsh language communities should be a firm planning consideration in Gwynedd and beyond.
73	Adran Cynllunio a Thai, Cyngor Sir Ddinbych (Angela Loftus) [2719]	PS1	Support	Support the inclusion of a policy within the Plan.
125	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	PS1	Support	2 states that proposals that cause significant harm to the character and linguistic balance of communities due to their size, scale or location will be refused and 4 promotes the use of welsh place names for new development, house names and street names. We fully support these policies.
127	Home Builders Federation Ltd (Mr Mark Harris) [1470]	PS1	Object	Point 2 is considered over onerous and requires further clarification. Such impact would need to be tested and assessed this would normally be done through some form of 'impact assessment'. The policy should instead set thresholds above which an assessment is required. The words 'size & amp; scale' need to be quantified. In setting a threshold for residential development care needs to be taken to not set it too low as this will discourage smaller builders due to the extra work and cost associated with new development.  Delete point 2 or reword to provide clarification as above.
279	Mr Aled Evans [2646]	PS1	Object	The Welsh language  Restrict large developments in general
339	Miss Ffion Jones [2856]	PS1	Object	It is said that the Council will refuse proposals that would, due to its scale, size or location, cause significant harm to the character and balance of a community's language. It is intended to build large estates in our local villages and towns. Without a doubt, this will change the character and balance of a community's language. Without conducting proper research, who knows who will buy these new

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	
				houses - and more importantly, who can afford to buy them? The salaries of local young people are very low, and many struggle to get mortgages. Filling the new estates with non-Welsh speaking migrants will most certainly have a detrimental impact on our communities and language.	
392	Dr Richard Roberts [2938]	PS1	Object	The 'SO1 Protecting and strengthening the Welsh language' cannot be reconciled with a housing target of 7902 (which is based on migration) in the light of naturally static population growth projections and in light of the language results of the 2011 Census. The likely harmful impacts of the JLDP on the Welsh language can be honestly noted, expanding on the acceptance of those harmful impacts due to the priority given to any other strategic objective. That would estimate a more sophisticated evaluation of priorities in a real situation (it is naively suggested in the deposit version of the JLDP that all the objectives correspond with each other). Another option would be to reconsider the number of houses that are suggested to be built during the plan period.	
793	Bangor Civic Society 1 (Don Mathew) [2988]	PS1	Support	Policy PS1 is supported.	
794	Tom Brooks [3034]	PS1	Support	I support PS1 on Welsh Language and Culture especially where it records "The Councils will promote and support the use of the Welsh Language in the Plan area. This will be achieved by:  1. Using appropriate mechanisms to ensure that suitable measures that mitigate negative impacts are provided or a contribution is made towards them"	
797	Cyngor Cymuned Botwnnog (Mrs Gwenda Roberts) [1541]	PS1	Object	The Plan states that everything needs to be bilingual. Shouldn't this be 'in Welsh' or bilingual. It must be remembered that we are in the Welsh language stronghold in the Llyn Peninsular.	
800	Jina Gwyrfai [3092]	PS1	Object	Promotion of the language as a basic principle? At the same time reference is made to 'mitigate negative effects'. These principles don't align. The language used isn't strong enough - 'encourage' bilingual signs, 'use of Welsh place names'. Using 'encourage' isn't robust enough. The conclusion is that the Welsh language isn't an important part of the Deposit Plan. No robust evidence is provided to demonstrate your real concern for the Welsh language. Using the Welsh language must be mandatory, working with the Language Commissioner to require Welsh names and signs, language impact assessment should be mandatory, every development for local people i.e. affordable.	
874	Friends of Borth-y Gest (Tom Brooks) [3036]	PS1	Support	SO1 seeks to "safeguard and strengthen the Welsh language and culture and promote its use as an essential part of community life." We support PS1 especially where it records "The Councils will promote and support the use of the Welsh language in the Plan area. This will be achieved by: 1) using appropriate mechanisms to ensure that suitable measures that mitigate negative impacts are provided or a contribution is made towards them."	
885	Mr John Tripp [252]	PS1	Object	Remember need to protect the language. Not enough done. Link to Local Agenda 21.	
937	Cyng/Counc Alwyn	PS1	Object	The Strategic Policy is to be welcomed, but there is a need to look at the Plan in a more coherent	

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	
	Gruffydd [381]			way to ensure that this policy is implemented to ensure that other elements of the plan, such as the policy on housing numbers, does not militate against it.	
				Due to the unique nature of the county the Welsh language has to be an important consideration in the planning process. I believe that the development boundaries need extending in order to defend the language and our communities.	
955 958	Menter Môn (Helen Thomas) [1615] Hunaniaith (Debbie A. Williams Jones) [3037]	PS1	Object	The Strategic Policy is to be welcomed, but the Plan should be looked at in a more coordinated way to ensure that this policy is implemented to make certain that there are no other elements of the plan, such as the housing numbers policy, that militate against it.  Due to the unique nature of the County there is a need for the Welsh language to be an important consideration in the planning system. Believe it is necessary to extend the boundaries to defend the Welsh language and vitality and viability of the Welsh language in the communities of Anglesey and Gwynedd. The Deposit Plan needs to reflect the fact that the Welsh language is a horizontal theme throughout the whole Plan. Clarity is required over how it is intended to protect the Welsh language.	
1115	Horizon Nuclear Power (Miss Sarah Fox) [2919]	PS1	Object	Horizon considers that in the absence of the SPG (cited as forthcoming in paragraph 7.1.4), it is unclear how this policy test will be applied. As currently drafted, this element of the Strategic Policy may risk becoming a barrier to economic growth and other aspirations in the Plan. Horizon submits that the paragraph needs to be amended to build in further flexibility and clarify, among other things, what is meant by "significant harm", the factors relevant to assessing potential harm, and how other policy objectives in the Plan will be weighed against this policy objective.	
1432	Cyngor Tref Penrhyddeudraeth (Mr Glyn Roberts) [1261]	PS1	Object	Penrhyndeudraeth Town Council is of the opinion that the Plan's approach to the community strategy (Test of Soundness C4) isn't beneficial to this community, that is: if the houses that are built aren't bought by the centre's residents, there is every chance that the developers will sell them to anyone they wish, e.g. migrants, which would mean another reduction in the proportion of Welsh speakers.	
1438	Cyngor Gwynedd (Cyng/Counc Gareth Thomas) [402]	PS1	Object	I am of the opinion that the consideration given in this Plan to the community strategy (Test of Soundness C4) is beneficial to this community, that is:  If the housing that are built aren't bought by the residents of the centre, there is every possibility the builder will sell them to whoever he wishes, e.g. migrants, which would mean another reducing the proportion of Welsh speakers.  Therefore, no housing should be built other than to meet local need that is the community of Penrhyndeudraeth.	
107	CPERA (Cynghorydd Elin Walker Jones) [2760]	7.1.4	Support	WG's recommendation to consider the impact on the Welsh language in Bangor. Work completed looking at wards across Gwynedd, therefore looking at Hirael but not at Bangor as an entity. Need detailed research on the language and planning in Bangor in order to give information to the planning process, as well as the impact on the Welsh language.	

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
120	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	7.1.4	Object	It is stated that the Welsh language will be promoted through various policies in the Plan. Which policies are these? Why aren't they listed? It is also further stated that a Supplementary Planning Guidance will be published to provide further guidance about the matter. We consider that this guidance should be an operational part of the original Plan.

## **Infrastructure and Developer Contributions**

#### Introduction

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1433 1454	Cyngor Tref Penrhyddeudraeth (Mr Glyn Roberts) [1261]  Cyngor Gwynedd (Cyng/Counc Gareth Thomas) [402]	7.1.5	Object	The existing network/ infrastructure in Penrhyndedruaeth and Minffordd, e.g. roads, parking, family medical services, is under pressure. Because  * There is no additional land nearby to extend the existing school;  * An increase in the number of patients would add to the pressure on family practitioners, which is already considerable;  * As there will be a considerable increase in traffic through Penrhyndeudraeth when Pont Briwet is completed this will definitely slow vehicle movement along the highway through the village, they shouldn't be expected to be able to accommodate 152 new housing. Accommodating 59 will be more than sufficient.  The Regulations that allow authorities to charge developers to use money to provide a range of infrastructure is irrelevant in the above context.
1118 1119 1120	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.1.7 & 7.1.8 & 7.1.9	Object	Horizon considers the clarity of these paragraphs should be improved. The Councils' position on how it will manage pooling restrictions going forward after 6 April 2015 should be set out in full as this is critical for developers including Horizon to understand. Horizon makes further representations on the terminology surrounding and use of CIL receipts, section 106 agreements and community benefits in relation to Policies PS2 and ISA1.
416	Welsh Highland Railway (Mr Graham Farr) [254]	7.1.9	Object	Careful consideration needs to be given to the potential adverse impact of CIL on the viability of new development such as the Company might propose in accordance with Candidate Site submissions refs: SP552 and SP870 (copies of forms attached).

# **PS2 – Infrastructure and Developer Contributions**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
144	Lafarge Tarmac Trading Limited [2735]	STRATEGIC POLICY PS2	Object	There is no definition of what development will be subject to what planning obligations.  Given the specific characteristics of mineral extraction. Minerals development should not be subject to CIL.
119	Home Builders Federation Ltd (Mr Mark Harris) [1470]	STRATEGIC POLICY PS2	Object	Delete the second sentence as this is not needed in the policy and should be in the supporting text. When referring to commuted sums this also needs to refer to adoption as one can not have one without the other.  Essential Infrastructure' needs to be defined. There needs to be clarity between infrastructure such as services and roads which are essential and other developer contributions as listed in policy ISA1 which should be negotiated based on the impact/ viability of the scheme not 'expected'.
145	Ellesmere Sand & Gravel Company Limited [2686]	STRATEGIC POLICY PS2	Object	There is no definition of what development will be subject to what planning obligations.  Given the specific characteristics of mineral extraction, Minerals development should not be subject to CIL.
1088	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	STRATEGIC POLICY PS2	Object	NRW wish to highlight that there is uncertainty as to whether there will be adequate water resource capacity during the operation of the proposed Wylfa Newydd. The requirements to increase water capacity has the potential for environmental impacts. Your Authority should be aware of the potential need for the LDP's focus changes or monitoring of the plan to take into consideration any updated information provided by Horizon with regards to water capacity requirements.
1122	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS2	Object	The Councils' intention with regard to the extent of these policies is not clear. The amendments made make it clear that s106 obligations sought must be levied in accordance with the regulatory tests i.e. contributions must meet the Community Infrastructure Regulations 2010 regulation 122 tests:  . * necessary to make the development acceptable in planning terms;  . * directly related to the development; and,  . * fairly and reasonably related in scale and kind to the development.  These policies should be reconsidered to make this clear.

#### **ISA1 – Infrastructure Provision**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
146	Lafarge Tarmac Trading Limited [2735]	Dalian ICA4	Ohiont	There is no definition of what development will be subject to what planning obligations.
147	Ellesmere Sand & Gravel Company Limited [2686]	Policy ISA1	Object	Given the specific characteristics of mineral extraction. Minerals development should not be subject to CIL.
303	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	Policy ISA1	Support	We welcome the inclusion of nature conservation in the list of purposes for which contributions may be sought.
439	Welsh Highland Railway (Mr Graham Farr) [254]	Policy ISA1	Object	Careful consideration needs to be given to the adverse impact any requirement for developer contributions may have on the viability of new development such as the Company might propose in accordance with Candidate Site submissions refs: SP552 and SP870 (copies of forms attached). Delete sentence 'Where proposals must be funded by the proposal.'
469	Home Builders Federation Ltd (Mr Mark Harris) [1470]	Policy ISA1	Object	There is no reference to the need to assess the viability of the development to afford the contributions requested and also the need to decide between competing requirements which can't all be afforded by the development. The difference between required infrastructure such as services and other S106 contributions needs to be made.
511	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	Policy ISA1	Object	Interpretation, conservation and enhancement of historic features, monuments, buildings or landscape elements should be considered in this list
697	Barton Willmore (Mr Mark Roberts) [1645]	Policy ISA1	Object	This policy seeks to ensure that financial contributions or infrastructure are provided by development proposals where necessary in order to make them acceptable and to allow the development to proceed.  However, contributions are sought to a broad range of potential purposes which are not clearly defined, are not related to planning, or are not in the control of an applicant or indeed a council to deliver.  The policy fails the CIL regulations and should be amended accordingly.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				The policy therefore does not comply with Test of Soundness C2 as it does not comply with Planning Policy Wales and CE2.
948	CPERA (Cynghorydd Elin Walker Jones) [2760]	Policy ISA1	Object	It is necessary to ensure that Bangor's infrastructure can cope with the additional dwellings. The roads, schools, GPs surgeries, water systems, sewage systems, police services, the hospital, let alone the general amenities are already unsuitable for the population in Bangor without adding more to them. Nothing should be built unless residents have easy access to adequate infrastructure including schools, surgeries, shops and community amenities.
1060	Welsh Government (Mr Mark Newey) [1561]	Policy ISA1	Object	Clarification is required about what infrastructure is required to deliver the allocated sites and how and when this will be delivered within the plan period, and whether any phasing of development will be required. It is not clear whether Policy ISA1 priorities the infrastructure requirement or whether this is merely a list. The viability work relating to the site deliverability is also weak The authority should also be able to indicate a priority list, in the generality, of what obligations it will seek from development and the financial magnitude of such obligations and the impact of viability. If a CIL is not in place, there could be a policy vacuum in the plan's ability to capture financial receipts to support development.
1173	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	Policy ISA1	Support	In order to ensure that sufficient infrastructure exists for domestic development capital investment is sought in the 5 year Asset Management Plans (AMP) to address deficiencies. An adopted Local Plan with identified growth helps strengthen the company can put forward in relation to AMP funding projects. Due to the regulatory framework there is potential disparity in the timeframes of our AMP and the LDP. There may be instances where 'lead-in' times are required to bring an infrastructure project and associated funding to fruition. Where specific infrastructure improvements are required in advance of AMP investment we support the provision within the policy of seeking financial contributions from developers to secure necessary improvements.
109	CPERA (Cynghorydd Elin Walker Jones) [2760]	7.1.10	Support	Not enough attention has been given to Bangor's infrastructure when building. You cannot construct one more house in Bangor without considering infrastructure - roads, sewerage, water supply, surgeries, schools, shops, parks, the police, hospitals, community centres and play areas etc.
1125 1126	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.1.10 – 7.1.12	Object	The clarity of these paragraphs should be improved. There is little consistency in the terminology used such that the Plan isn't clear as to expectations in terms of what the Councils are proposing when referring to "community benefits".

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1127				There appears to be overlap in the use of this term to cover a number of concepts:  . * Section 106 obligations (as referred to in PS2).  . * "community infrastructure contributions" (7.1.10) and "infrastructure provision" (7.1.11)  . * Planning obligations (7.1.10 and 7.1.11)  . * CIL levy receipts (7.1.10)  . * Voluntary "community benefits" offered by developers.  Terms and definitions are proposed.
121	Home Builders Federation Ltd (Mr Mark Harris) [1470]	7.1.10	Object	Confusion is caused by the use of a number of terms which appear to relate to the same thing these being 'infrastructure', 'community benefit' and 'community infrastructure contributions'. Use one word to describe S106 contributions to avoid confusion.  There is no reference to the need to assess the viability of the scheme to provide the 'community benefits'. Additional wording required or new para to talk about viability assessments in relation to the amount and range of community benefits requested.
1087	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	7.1.13	Object	Paragraph 7.1.13 of the Deposit Plan notes that engagement with Dwr Cymru/Welsh Water has been undertaken through Plan preparation process. NRW is aware that there may be capacity issues with Treborth Waste Water Treatment Works that serves Bangor, Y Felinheli, Bethel, and an area of south Anglesey. This may constrain development within these areas, and therefore we strongly recommend that Dwr Cymru / Welsh Water's views are sought on this specific issue.

# ISA2 – Community Facilities

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
267	The Theatres Trust (Ross Anthony) [2825]	POLICY ISA2	Support	The Theatres Trust supports this policy. It now provides a clear statement for the protection and enhancement of your existing essential community and cultural facilities, and along with Policy ISA1, encouragement to provide new and additional facilities.
1128	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY ISA2	Object	Generally supportive of Policy ISA2, it needs to be recognised that any facilities which could be classed as community facilities which may come forward within worker accommodation campuses as part of its Worker Accommodation Strategy should not be subject to these policies.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Rather than seek for specific amendments to policy ISA2 however, Horizon is to relying on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development (i.e. temporary worker accommodation) from these policies.
1394	Cyng/Counc RH Wyn Williams [367]	POLICY ISA2	Object	I would like you to consider the following regarding Abersoch, because the plan is for a period of 10 years or more:-  The bounded area should be identified as a location for services without any growth
1417	NFU Cymru (Dafydd Jarrett) [3285]	POLICY ISA2	Object	The NFU would like to make the following general comments about the Development Management Policies included in the draft Plan. Opportunities that would not prevent the following development:  * Provision of community facilities that satisfy local need.

# ISA3 – Further and Higher Education Development

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1129	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY ISA3	Object	Horizon notes that these site selection limitations are potentially too restrictive if applied to its associated development. Rather than seek for specific amendments to policy ISA3 Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development (i.e. simulator building) from these policies.

# ISA4 – Safeguarding Existing Open Space

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
110	CPERA (Cynghorydd Elin Walker Jones) [2760]	7.1.20	Support	Existing open plots should not be built on or destroyed at all

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1071	Mr Mark Newey, Welsh government	7.1.21	Object	'surplus provision' or 'over provision' - It is not clear how the Councils will demonstrate surplus/ over provision of open space, as described at clause 1 and in Para 7.1.21.

## ISA5 – Provision of Open Spaces in New Housing Developments

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
122	Home Builders Federation Ltd (Mr Mark Harris) [1470]	Policy ISA5	Object	Point 1 is unacceptable as a developer cannot be expected to provide open space off site on land he doesn't own. If provision cannot be provided on site then an off site contribution should be taken to improve existing facilities in the area as at point 2. There is no reference to the adoption/management of such spaces.  Point 1 should be removed or reworded. Reference needs to be made in the explanatory text with regard to adoption and management of such spaces.
304	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	Policy ISA5	Object	Greater emphasis should be given to the provision of unstructured open space in this policy and paragraph 7.1.23 and others. At a time when young people are better-informed about environmental issues but also increasingly cut off from direct contact with nature, we think that opportunities to discover the outdoors first-hand must be provided. Through links with other policies and strategies the LDP can allow young people to engage more in their own surroundings and with examples of conservation and sustainability in action.
1130	Horizon Nuclear Power (Miss Sarah Fox) [2919]	Policy ISA5	Object	Horizon notes that these criteria in this policy are not appropriate for its temporary construction worker accommodation. For example it would be an inappropriate standard for typical occupiers e.g. construction workers, students in temporary single person accommodation, to require children's play space.  Rather than seek for specific amendments to ISA5 to exclude application of this policy from the worker accommodation, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which would be the relevant policies against which to determine associated development applications. For this reason Horizon isn't proposing specific exclusion of its associated development from this policy.

### **Information and Communications Technology**

### **PS3 – Information and Communications Technology**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
533	Mobile Operators Association (Mr John Cooke) [1638]	STRATEGIC POLICY PS3	Support	We support the inclusion of Strategic Policy PS3 which we consider to be in accordance with national policy and guidance.
1415	NFU Cymru (Dafydd Jarrett) [3285]	STRATEGIC POLICY PS3	Support	The NFU would like to make the following general comments about the Development Management Policies included in the draft Plan. Opportunities that would not prevent the following development:  * Allowing technology development to facilitate employment development in rural areas;  * Support working from home and measures that would improve broadband and communication particularly in the remote areas.

# **Sustainable Transport, Development and Accessibility**

# PS4 – Sustainable Transport, Development and Accessibility

Comment Number	Name	Section	Туре	Summary of Comments / Changes to the Plan
664	Noel Davey, Campaign for the Protection of Rural Wales	Strategic Policy PS4 Sustainable Transport	Object	We support the transport hierarchy in PS4 and para 7.1.28 which gives priority to access by walking and cycling, so as to minimise the need to travel by private car. PS4 #3 aims to "Improve and enhance the public footpath and cycleway network to improve safety, accessibility by these modes of travel". We would add "and to increase health, leisure, well-being and tourism benefits for both local residents and visitors". The strategy appears to have mainly access for new development projects in mind, but should also address wider RoW network issues.
1131	Horizon	Strategic Policy PS4 Sustainable Transport	Object	Horizon welcomes the policy requirement that development will be located so as to minimise the need to travel. This supports Horizon's stage one pre-application consultation which has based site selection for accommodation on (among other factors) its proximity to the Wylfa site. Provision of on-site facilities and services further supports this approach, with connection to other existing settlements forming a secondary consideration. Horizon's amendment seeks to remove linking rail upgrades with its project to the policy specifically on rail infrastructure. Horizon has clarified that infrastructure improvements required must be required in accordance with the CIL Regulations.

Comment Number	Name	Section	Туре	Summary of Comments / Changes to the Plan
148	Ellesmere Sand & Gravel Company Limited	Strategic Policy PS4 Sustainable Transport	Object	With a preferred area of search for sand and gravel identified at Bodychain, Llanllyfni under Policy MWYN3, should this area prove commercially viable and planning permission be granted the existing plant site could be utilised at Cefn Graianog with a connection under the existing footpath/cycle path being required. As such some might consider this would not enhance the footpath/cycle path.  At point 3 start with quote: "Where possible improve and enhance"
448	Bourne Leisure Ltd	Strategic Policy PS4 Sustainable Transport	Object	Bourne Leisure considers that the following sentence should be added to PS4:  "in rural areas, the Council acknowledges that there is little alternative but to travel by private car."
527	Bangor Civic Society	Strategic Policy PS4 Sustainable Transport	Support	PS4 – Sustainable Transport
617	Mr Mark Roberts, Barton Willmore, Cardiff	Strategic Policy PS4 Sustainable Transport	Object	Support the overall aims and objectives of this policy, however the statement "development will be located so as to minimise the need to travel" does not reflect PPW. PPW only refers to "minimising the need to travel, and increasing accessibility by modes other than the private car (paragraph 4.7.4) and not minimising the need to travel in isolation. The policy is therefore overly rigid, not positively prepared and does not recognise the ability of bus, cycle and pedestrian links to offer sustainable, convenient access to various services.
1280	Bourne Leisure	Strategic Policy PS4 Sustainable Transport	Object	Emerging transport policies should recognise that due to the location of many tourist facilities and attractions, there is often no other feasible option available other than the private car to reach certain tourist development. Bourne Leisure is disappointed that PS4 fails to recognise that some tourism sites are located in rural areas where no public transport exists. PS4 as currently drafted is unsound as it is not in accordance with national policy. TAN18: Transport (March 2007) specifically acknowledges that some tourist developments rely on car-based travel and advises: "in rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific area" (para 3.15) Bourne Leisure considers that the following sentence should be added to PS4: "in rural areas, the Council acknowledges that there is little alternative but to travel by private car."

TRA1 – Transport Network Developments

Comment Number	Name	Section	Туре	Summary of Comments / Changes to the Plan
1091	Natural Resources Wales	Policy TRA1 Transport Network Developments	Object	The Plan outlines 4 transport schemes that will be secured during the Plan period including the A487 Caernarfon to Bontnewydd bypass, the Llangefni Link Road, a new Menai Strait Crossing and road improvements on the A5025 from Valley to Wylfa Newydd. NRW would appreciate being involved in the discussions regarding these proposed schemes as early as possible in order to identify key development constraints and provide advice. For some of the above named schemes NRW has already provided Scoping advice.
1132	Horizon Nuclear Power	Policy TRA1 Transport Network Developments	Object	<ul> <li>There is a typographical error in 2. (ii) and (iii) where in each case "facilitates" should be amended to read "facilities". (Not shown in the specific amendments sought.)</li> <li>Amend 3(i) for clarity including bring the table into the policy so it is clear what development is affected.</li> <li>New 3(ii) then arises from the second limb of the existing text (after the table).</li> <li>Amend 4(iii) to ensure there is no suggestion that the Plan is pre-empting the environmental impact assessments which Horizon is undertaking and from which the need for transport infrastructure upgrades should derive from.</li> </ul>
1133 & 1134	Horizon Nuclear Power	Paragraphs 7.1.30 to 7.1.44	Object	Related to the representations on TRA1, new wording to replace existing paragraph 7.1.41 has been provided to avoid pre-emption and to refer to the development of Horizon's Integrated Traffic and Transport Strategy ("ITTS"). Horizon supports the inclusion of a suitably worded statement in support of it working in partnership with the Councils to develop an agreed ITTS for the Project, to be supported through policy TRA1.
1185, 1186, 1187	Welsh Water	Policy TRA1 Transport Network Developments	Object	There are a number of locations where the proposed route passes over DCWW assets (public sewers and water mains). Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
525	Bangor Civic Society	Policy TRA1 Transport Network Developments	Object	TRA1: Transport Networks 4) 'Transport Schemes' - theme is a complete absence of any rail proposals.
876	Mr John Tripp, Porthaethwy	Policy TRA1 Transport	Object	* too much emphasis on cars; *cycleways to be implemented (not positive enough);

Comment Number	Name	Section	Туре	Summary of Comments / Changes to the Plan
		Network Developments		* rail and bus. Electric rail - as part of extension of the HS3 Holyhead to Hull.
1055	Mr Mark Newey, Llywdoraeth Cymru	Policy TRA1 Transport Network Developments	Object	The potential loss of BMV land could result in the permanent loss of approximately 40 hectares. The majority of the land is included in allocations TRA1, C14 and C15 and the plan has limited evidence to demonstrate that paragraph 4.10 has been considered at all in allocating these sites for development.
683	Barton Willmore	7.1.31	Object	Paragraph 7.1.31 and 7.1.32 provides extensive commentary on the need and requirements for Transport Assessments, but duplicates PPW. This is unnecessary.
530	Bangor Civic Society	7.1.37	Object	Tern E22 – Clarification is needed of whether Britannia Bridge and parts of North Wales are still on E22.
877	Mr John Tripp	7.1.37	Object	Menai Straits Crossing – why not submerge tunnel from Griffiths Crossing. Has thought been given to:  *reversible 2 lane crossing on A55  *the rail deck beneath the A55 is only 50% used.
512	Gwynedd Archaeological Trust Planning Service	7.1.42 (Policy TRA1 Transport Network Developments)	Support	Formal consultation on these improvements will be required since some of these areas have the potential to impact upon the archaeological resource.

## TRA2 – Parking Standards

Comment Number	Name	Section	Туре	Summary of Comments / Changes to the Plan
1096	Mr Mark Newey, Llywdoraeth Cymru	Policy TRA2 Parking Standards (paragraph	Object	It should be noted that Planning Policy Wales sets out that local authorities should ensure that new developments provide lower levels of parking than have generally been achieved in the past. Technical Advice Note 18 states that maximum car parking standards should be used as a form of demand management.

Comment Number	Name	Section	Туре	Summary of Comments / Changes to the Plan
		7.1.45)		

## TRA3 – Safeguarding Disused Railway Lines

Comment Number	Name	Section	Туре	Summary of Comments / Changes to the Plan
161	Ellesmere Sand & Gravel Company Limited	Policy TRA3 Disused Railway Lines	Object	As with Policy PS4 with a preferred area of search for sand and gravel identified at Bodychain, Llanllyfni under Policy MWYN3, should this area prove commercially viable and planning permission be granted the existing plant site could be utilised at Cefn Graianog with a connection under the existing footpath/cyclepath being required.  Suggest re-wording of policy & quote: "Where appropriate and viable the possible re-opening of disused railway infrastructure for railway use or for alternative transport purposes will be promoted and encouraged."
440	Cyngor Tref Ffestiniog	Policy TRA3 Disused Railway Lines	Support	We hope that Gwynedd Council can help to solve this matter.

## TRA4 – Managing Transport Impacts

Comment Number	Name	Section	Туре	Summary of Comments / Changes to the Plan
150	Ellesmere Sand & Gravel Company Limited	Policy TRA4 Managing Transport Impacts	Object	The policy is considered too rigid and allows no scope for potential mitigation works through planning obligations and conditions. Each case should be dealt with on its merits and demonstrate through accompanying information with a planning application that it can work with or without mitigation.
151	Lafarge Tarmac Trading Limited			Revise wording to allow flexibility for negotiations.
598	Barton	Policy TRA4	Object	We are concerned that the test "proposals that would cause unacceptable harm to the safe

Comment Number	Name	Section	Туре	Summary of Comments / Changes to the Plan
	Willmore (Mr Mark Roberts, Cardiff)	Managing Transport Impacts		and efficient operation of the highwaywill be refused" is imprecise and not positively prepared. There is nothing in the policy as to what constitutes "unacceptable". Development will have an impact on highway networks through increased traffic. Also, the policy does not allow or consider the ability of development proposals to mitigate or reduce impacts on the network.  Change: We consider that the policy should state that developments which would have a "severe/significant unacceptable residual impact" should be the required test.
529	Bangor Civic Society	TRA4 Managing Transport Impacts	Object	TRA4: Transport impacts. delete 'where necessary'. Safe provision should always be provided for groups listed.
1835	Mr Noel Davey, Council for the Protection of Rural Wales	TRA4 Managing Transport Impacts	Object	This policy is quite weak and gives cursory treatment of planning commitments for public rights of way. Wording in the JLDP along the lines of that in the Gwynedd UDP policy CH22 'Cycling Networks, Paths and Rights of Way' is required, giving a much more detailed and explicit commitment to safeguarding and promote the RoW network. The JLDP should recognise its importance for visitor economy, recreational benefits, national health and well-being with a strong emphasis on safeguarding and promoting the All Wales Coastal path.

## 7.2 - Sustainable Living

## **Sustainable Development and Climate Change**

#### **Context and Introduction**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
770	Campaign for the Protection of Rural	7.2.4	Object	We appreciate that emerging national policy sees 'sustainable development' as the main purpose of the land use planning system and requires the LDP to place these principles at
	Wales (Mr Noel Davey)			the heart of its local strategy. However, we question whether the proposed sustainable

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[1169]			development policies can be applied effectively at the more local scale in the planning system. We have a major concern that so much weight is to be placed on three generalised policies related to sustainable development (PCYFF1-3). We think that the testing of all proposals against these overarching principles could readily become a bland ritual without much meaning in every Design and Access Statement, while at the same time planning decisions could become more arbitrary and less objective when tested against these generalised statements. The emphasis gained from explicit criteria attached to individual policies for each type of proposal will be lost. In many cases there will be no explicit policy, but only a requirement to refer to the broad sustainable development polices.
1056	Welsh Government (Mr Mark Newey) [1561]	7.2.4	Object	A Renewable Energy Assessment has been undertaken for both areas, however the Deposit Plan fails to take the opportunity to take into account the contribution the area can make towards developing and facilitating renewable and low carbon energy and plan positively for appropriate development. Further consideration needs to be given to how to translate the evidence base into a set of policies which guide appropriate development. For example, could the assessment work provide evidence to provide opportunities for higher sustainable building standards on strategic sites or can the co-location of developments optimise opportunities for renewable energy?

## **PS5 – Sustainable Development**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
111	CPERA (Cynghorydd Elin Walker Jones) [2760]	STRATEGIC POLICY PS5	Support	Construction should occur on brownfield sites and not on greenfield sites. It is recommended to look at how to reuse brownfield sites prior to new building on greenfield sites, including demolishing housing if they are not fit for purpose. Better use should be made of brownfield sites in order to safeguard greenfield sites and fields. For example, there is an area near the Dewi Sant precinct roundabout which is deserted due to demolishing housing; Hendrewen; corner site opposite Ysbyty Gwynedd. e.g. flats could be built near the Dewi Sant precinct with a parking floor to avoid flood problems.
167	Ellesmere Sand & Gravel Company Limited [2686]	STRATEGIC POLICY PS5	Object	This general policy lacks clarity as to where it applies e.g. not all landscapes and biodiversity assets are of the same value and it will not always be possible to 'protect and enhance' assets. If it is considered to apply to mineral extraction sites suggest changes as set out below.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
168	Larfage Tarmac Trading Limited [2735]			Suggest a hierarchy for assessing environmental effects of development proposals (not all landscapes and biodiversity assets are of the same value) and notwithstanding other policies in the development plan.  At point 3 include former quarry sites in definition of previously developed land and remove reference to development boundaries.  At points 6 and 7 start "Where possible"
397	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	STRATEGIC POLICY PS5	Support	DCWW support the inclusion of this policy and its emphasis upon reducing the amount of water used and wasted, and reducing the effect on water resources and quality, and maximising the use of sustainable drainage schemes. We fully support the promotion of sustainable development and look to your authority to ensure that appropriate designs include water efficiency, water conservation and sustainable drainage to comply with high standards of the Code for Sustainable Homes and BREEAM.
766	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGIC POLICY PS5	Object	All development proposals are required to fulfil nine objectives. We fully agree with the objectives in principle but do not see how all proposals, such as small extensions to houses, could demonstrate in practice how they would contribute to all of them, especially #6 'preserve and 'enhance' the quality of assets' and #7 protect and' improve' the quality of the natural environment. There is probably a need to add some qualifier e.g. 'wherever possible'. It is noted that the introduction of objectives #10-14 does include the words 'proposals should also where appropriate:'
767	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGIC POLICY PS5	Object	PS5 #4 'Promote greater selfcontainment of Centres and Villages by contributing to balanced communities that are supported by sufficient services; cultural, arts, sporting and entertainment activities; a varied range of employment opportunities; physical and social infrastructure; and a choice of modes of travel;' This approach will clash with pressure for 'economies of scale' e.g. the current arguments about concentration of services in N Wales NHS.
768	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGIC POLICY PS5	Object	Criterion 13 Improve sense by inserting 'car' and deleting 'means of': 'Reduce the need to travel by car and encourage the opportunities for all users to travel when required as often as possible by means of alternative modes'.
852	Barton Willmore (Mr Mark Roberts) [1645]	STRATEGIC POLICY PS5	Object	This is a 14-part policy, requiring compliance with a plethora of issues. It does not embody a presumption in favour of sustainable development set out in PPW. It does not allow the

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				balancing of the benefits of development to the social, economic and indeed environmental (remediation and redevelopment of previously developed and contaminated site for example) themes with any adverse impacts. It is a largely negatively worded policy. PPW provides a clear presumption in favour of sustainable development. It does not embody any aspect of this approach and should be rewritten to provide a positive policy and presumption in favour of sustainable development.  It should be re-worded in order to provide a positive policy and a presumption in support of sustainable development.
853	Barton Willmore (Mr Mark Roberts) [1645]	STRATEGIC POLICY PS5	Object	We note that there is no policy, which expresses in overall terms and from which all policies flow that provides a presumption in favour of sustainable development.  This is fundamental of the approach of the Welsh Government and PPW.  There is a sustainable development policy, Policy PS5; however this does not provide a "presumption in favour of sustainable development."  This omission is a stark omission and significant oversight which goes to the heart of the policies and approach of the Plan.  Policy which gives presumption in support of sustainable development.
986	Welsh Slate Ltd [3147]	STRATEGIC POLICY PS5	Object	Whilst listing 13 objectives there is a total failure to include any reference to minerals, regardless of any reference/s to Strategic Policy PS18.
1135	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS5	Object	Horizon considers that it would be beneficial to remove some of the repetition, circularity and potential inconsistencies arising from references to other policies. For example, criteria 5, 6, 16, 10, 11, 12, 13, 14 simply cross refer to other policies which will apply to and control these matters.

## PS6 – Alleviating and Adapting to the Effects of Climate Change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
126	Home Builders Federation Ltd (Mr Mark Harris) [1470]	STRATEGIC POLICY PS6	Object	It is not clear how these requirements link to Building Regulations. If as appears they may be looking to achieve higher standards than Building Regulations then this is likely to affect the viability of a scheme. Has the financial impact of meeting these requirements been

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				allowed for in the viability testing of housing/ affordable housing delivery?
				Provide clarification.
169	Ellesmere Sand & Gravel Company			Again general policy lacking definition of where it applies. If considered applies to mineral extraction sites suggest changes as set out below.
	Limited [2686]	STRATEGIC POLICY PS6	Object	Suggest a hierarchy for assessing effects of development proposals and notwithstanding other policies in the development plan.
170	Lafarge Tarmac Trading Limited [2735]	1 021011 00		At point 6 start "Where possible"  At point 10 start "Where possible"
398	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	STRATEGIC POLICY PS6	Support	DCWW support the inclusion of this policy and the requirement placed upon developers to aim for the highest possible standard in terms of water efficiency and the use of sustainable drainage systems. The tackling of surface water at source is a vital component of sustainable development and will go a long way to mitigate against overloading sewers which can ultimately lead to flooding. The Floods and Water Management Act 2010 reinforces the obligations for developers to incorporate sustainable drainage systems as part of their developments.
451	Bourne Leisure Ltd [2768]  Nathaniel Lichfield &	STRATEGIC POLICY PS6	Object	The Local Plan should recognise that specific uses, such as tourism uses, are often already sited on the coast or in river floodplains and that such uses require to be located adjacent to water in order to continue to attract visitors. The Local Plan should therefore allow for proposals for the improvement/expansion of existing tourism accommodation and facilities
845	Partners (Mr Arwel Evans) [2767]	1 02.01 1 00		to be considered on a more flexible basis to new developments in such locations.
661	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGIC POLICY PS6	Support	We agree that tackling climate change and reducing carbon emissions is a key objective. We support the 'energy hierarchy' concept proposed in PS6 where ranked priority is given to 1) reducing need 2) efficient use and supply, before 3) using renewable energy. We also agree that renewable energy should be used wherever 'practical and viable' and should be 'consistent with the need to engage and involve local communities, protect visual amenities, the natural, built and historic environment and the landscape'.
769	Campaign for the Protection of Rural Wales (Mr Noel Davey)	STRATEGIC POLICY PS6	Support	The proposed energy hierarchy is fully supported.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[1169]			
846	Nathaniel Lichfield & Partners (Mr Arwel Evans) [2767]	STRATEGIC POLICY PS6	Object	Bourne Leisure supports sustainable development in its buildings, venues and accommodation units. All new buildings, refurbishments of existing venues and the company's hire fleet holiday homes incorporate a number of features designed to achieve sustainable development. It is considered that sustainable design and construction should be primarily sought via Building Regulations. It is proposed that the Plan should make it clear that the initial design of a building will need to consider the ability to meet Building Regulations' requirements in the future. Based on the fact that TAN22 was cancelled it is unnecessary for the Plan to make reference to energy efficiency features and measures.
859	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS6	Support	Policy PS6 is supported
1057	Welsh Government (Mr Mark Newey) [1561]	STRATEGIC POLICY PS6	Object	The renewable energy assessment could be used to improve the policy wording for PS6 and PCYFF4, as these stand they lack clarity. The energy assessment could make it clear what is expected and to what scale/ type of development the policies apply.

## PCYFF1 – Development Criteria

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
123	Home Builders Federation Ltd (Mr Mark Harris) [1470]	POLICY PCYFF1	Object	At point 4 the ability to build at a lower density needs to be not only based on local circumstances but also needs to take account of site constraints such as levels on sites or service easements.
				Add to the wording in brackets at point 4 after local add ' or site constraints'.
1136	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY PCYFF1	Object	Residual concerns that criterion 3 is more restrictive in terms development siting than other sections of the Plan. It is also noted that Policy PS15 relates exclusively to housing whereas the wording of PCYFF1 implies that it relates to all forms of development, which risks creating confusion. Criterion 4 is considered inconsistent with the drafting of the other criteria. Criteria 9 and 10 requirements are dealt with elsewhere in the Plan and could be deleted here. Criterion 14 is not sufficiently clear.
774	Barton Willmore (Mr Mark Roberts) [1645]	POLICY PCYFF1	Object	This policy provides a 14 part multi criteria policy, and the first and second requirements are that "A proposal must comply with all relevant policies of the Plan", and "must comply with national planning policy and guidance." This is considered to be an impossible task,

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				because the Policy does not:  * embody the presumption in favour of sustainable development and is not positively prepared.  * allow for any application of the key requirement of planning, which is the balance of often competing and conflicting objectives, thus considering, what policies are of key relevance, what weight should be given to competing objectives and how does a proposal comply with the "presumption in favour of sustainable development of the Welsh Government", and  * it replicates other policies in the Plan e.g. landscape, highways, design etc.  The Policy needs to be rewritten in a positively prepared manner with a presumption in favour of sustainable development.
124	Home Builders Federation Ltd (Mr Mark Harris) [1470]	POLICY PCYFF1	Object	Should not use the word 'must' as this does not allow the flexibility for other material planning considerations to form part of the determination process. This ability to consider other material planning considerations is a fundamental part of national planning legislation.  Change the word 'must' to 'should' on all the points where it is used.
171 172	Ellesmere Sand & Gravel Company Limited [2686] Lafarge Tarmac Trading Limited [2735]	POLICY PCYFF1	Object	General policy likely to be aimed at urban development but does not specify. There is no recognition of the particular circumstances of mineral working and the locational need for minerals to be worked where they are found. Suggest a hierarchy for assessing environmental effects of development proposals as not all environmental assets are of the same value. If applied too rigidly to mineral extraction sites then there is a risk of unnecessary sterilisation.  The policy should 'endeavour' to achieve the aims of the policy. Exceptionally some developments such as minerals will not be able to comply with the aspirations of the policy but those schemes should nevertheless still be permissible. Suggest start the policy with "Where relevant all proposals should endeavour" then delete points 1, 2 and 8 as they are unwieldy and unnecessary.
307	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY PCYFF1	Object	Greater emphasis should be given to the protection of the natural environment in this policy to reflect the importance of this issue throughout the LDP. Add point 15 "natural environment".
399	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY PCYFF1	Support	DCWW support the provision within this policy that planning permission will be refused where the proposed development would have an unacceptable adverse impact upon the health, safety or amenity of occupiers of local residences, other land and property uses or

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				characteristics of the locality due to drainage pollution.
437	Welsh Highland Railway (Mr Graham Farr) [254]	POLICY PCYFF1	Support	Support.
772	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY PCYFF1	Object	Criterion 4 Housing density. While agreeing that dense settlement can be efficient in terms of land use etc. the impression on the landscape of dense estates of detached houses is alien to the traditional landscape in North Wales where settlement has not been significantly concentrated, except in 19th century quarrying areas. (See PCYFF2) If density is to be encouraged it should be through the building of terraces, rather than little boxes. The terrace or even semi-detached units produce much better proportioned building blocks. The social (and economic) value of gardens should not be forgotten.
881	Mr John Tripp [252]	POLICY PCYFF1	Object	The uplands - a lot are overgrazed. Would like to see more 'regreening' to stop the immediate run off and flooding. Also, CO2 collect with trees.
1015	Ministry of Defence (MOD Safeguarding) [1275]	POLICY PCYFF1	Object	The MODs principle concern with respect to development in Anglesey and Gwynedd is ensuring that structures, particularly tall buildings do not cause an obstruction to air traffic movements at MOD aerodromes or compromise the operation of air navigational transmitter/ receiver facilities located in the area. The MOD height and technical safeguarding zones for the main operational base of RAF Valley and Mona extends over the area of Anglesey. The borough is also covered by the statutory birdstrike safeguarding zone encompassing RAF Valley and Mona. Therefore if/when development is progressed the MOD DIO should be consulted to ensure an accurate and effective assessment is carried out. Gwynedd does not fall within any statutory safeguarding consultation zones.

## PCYFF2 - Design and Place Shaping

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
173	Ellesmere Sand & Gravel Company Limited [2686]	POLICY PCYFF2	Object	General policy likely to be aimed at urban development but does not specify e.g. (not all landscape is of the same value). If considered to apply to mineral extraction sites suggest changes set out below.
174	Lafarge Tarmac			Each proposal should be dealt with on it merits however this policy if applied to mineral

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Trading Limited [2735]			extraction sites it would prove very difficult to comply with. Suggest start the policy with "Where relevant" then amend points two to start "Where possible".
400	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY PCYFF2	Support	DCWW support the requirement that drainage systems are designed to limit surface water run-off and flood risk and prevent pollution.
436	Welsh Highland Railway (Mr Graham Farr) [254]	POLICY PCYFF2	Support	Support.
775	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY PCYFF2	Object	Criterion 1 How practical is it to prove it 'enhances' as well as complements? When will it be judged 'relevant'?
776	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY PCYFF2	Object	5, 9, 11, 12 Use of design jargon - 'Secured by design inclusive design be legibleactive frontage' - meanings may not be intelligible to the lay reader; re-word, provide explanatory text or glossary.
778	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY PCYFF2	Object	Criterion 7ii must surely mean NOT precluding the reasonable use of neighbouring land.
943	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	POLICY PCYFF2	Object	I believe there should be specific reference to standard design that corresponds to the context of the AONB.
1425	NFU Cymru (Dafydd Jarrett) [3285]	POLICY PCYFF2	Object	The NFU would like to make the following general comments about the Development Management Policies included in the draft Plan. Opportunities that would not prevent the following development:  * New agricultural buildings that are suitable for contemporary farming having considered their scale, location, design and materials to reduce their visual impact on the landscape;  * Where possible new buildings should be grouped with any existing buildings in order to reduce their visual impact on the landscape. However, isolated buildings should be permitted if their location is essential to the agricultural activity if they aren't located in a prominent location.
779	Campaign for the	7.2.9	Support	We agree that proximity of poor development should not justify poor quality new

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Protection of Rural Wales (Mr Noel Davey) [1169]			development.
780	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	7.2.10	Object	This implies some proposals will not require a Design and Access Statement - clarify which ones and what is required instead.

## PCYFF3 - Design and Landscaping

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
175	Ellesmere Sand & Gravel Company Limited [2686]	POLICY PCYFF3	Object	General policy likely to be aimed at urban development but does not specify e.g. (not all landscapes are of the same value). If considered to apply to mineral extraction sites suggest changes set out below.
176	Lafarge Tarmac Trading Limited [2735]			Mineral extraction sites should be excluded from this policy suggest change of wording to start policy; "Where possible and in accordance with other policies set out in this plan"
781	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY PCYFF3	Object	We agree with the aims, but have concern about the ability to monitor and enforce landscaping plans and conditions in practice.
773	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY PCYFF3	Object	Criterion 1 - We have been unable to locate online detailed Seascape Character Area Assessments

## PCYFF4 - Carbon Management

	lep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
8	31	Adran Cynllunio a Thai, Cyngor Sir Ddinbych (Angela	POLICY PCYFF4	Support	Support this detailed and workable policy.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Loftus) [2719]			
385	Mon a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	POLICY PCYFF4	Object	There appears to have been a failure to identify any strategic sites where energy efficiency measures should exceed the regulatory building standard. Planning Policy Wales, edn. 5, paras. 6.6 and 6.7 is relevant in this respect, as is the letter from Carl Sargeant, dated 5 June 2014, which states that "In formulating their Local Development Plans, LPAs should continue to assess their strategic sites to identify opportunities to require higher than regulatory (sustainable building) standards". We therefore consider that, with regard to housing/energy efficiency, the Deposit JLDP fails consistency test C2 and coherence and effectiveness test CE2.
438	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	POLICY PCYFF4	Support	Ffestiniog Town Council supports this important policy to control carbon. Exciting plans to build housing and facilities that address the needs of the future should be supported.
453	Bourne Leisure Ltd [2768]	POLICY PCYFF4	Object	Bourne Leisure comments however that sustainable design and construction should be primarily sought via Building Regulations. However, the Company also notes that the initial design of a building in the planning process will need to consider the ability to meet Building Regulations' requirements in the future. This point of principle should be set out in the LDP, to ensure that no confusion arises. It is therefore unnecessary for the LDP to make reference to energy efficiency features and measures.
1058	Welsh Government (Mr Mark Newey) [1561]	POLICY PCYFF4	Object	The renewable energy assessment could be used to improve the policy wording for PS6 and PCYFF4, as these stand they lack clarity. The energy assessment could make it clear what is expected and to what scale/ type of development the policies apply.
1137	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY PCYFF4	Object	It is not clear what requirement this policy imposes on developers in relation to the "Potential Options". For example, do all options need to be considered and at least one implemented or is it permissible for no options to be implemented if evidence is presented showing that none of the options is feasible? It would be beneficial to reword this policy so that the particular obligation(s) are identified more clearly.

#### **PCYFF5 – Water Conservation**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
401	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY PCYFF5	Support	DCWW support the requirement that proposals should incorporate water conservation measures where practicable, including Sustainable Urban Drainage Systems (SUDS). The tackling of surface water at source is a vital component of sustainable development and will

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				go a long way to mitigate against overloading sewers which can ultimately lead to flooding.  The Floods and Water Management Act 2010 reinforces the obligations for developers to incorporate sustainable drainage systems as part of their developments.

# Renewable Energy Technology

## PS7 – Renewable Energy Technology

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1080	Welsh Government (Mr Mark Newey) [1561]	7.2.23	Object	It refers to the Welsh Government's Energy Policy Statement (2010). This has been superseded by Energy Wales: A Low Carbon Transition (2012).
180, 181	Ellesmere Sand & Gravel Company Limited [2686],  Lafarge Tarmac Trading Limited [2735]	POLICY PS7	Object	Consider this policy is repetitive of national policy e.g. (not all landscapes are of the same value). The policy is too restrictive and not positive toward renewable energy technologies on existing mineral extractions sites or toward previously used land.
607	Mr Paul Madden [3032]	POLICY PS7	Object	No mention is made of protecting tourist / visitor amenity. Tourism is the most important industry on Anglesey and as such should be protected.  Amend criteria (i) and (iii) through adding 'tourism' to the reference towards 'residential amenity'.  Criteria (ii) to be amended to read "ii. that installations in areas covered by international, national or local nature conservation designations in accordance with PS16 do not individually or cumulatively compromise the objectives of the designations".
662	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY PS7	Support	We also support the principles laid out in PS7 which describe that renewable energy installations should not individually or cumulatively compromise the objectives of designated protected landscape areas, including areas 'visible beyond their boundaries', and 'especially with regard to landscape character, biodiversity or residential amenity.'
765	Campaign for the Protection of Rural	STRATEGIC POLICY PS7	Object	PS3 states in the context of information and communications technology infrastructure that 'to lessen the visual impact of new overhead lines associated with developments, especially

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Wales (Mr Noel Davey) [1169]			in sensitive locations, they should be placed underground.' This should also apply to electricity transmission cables, particularly in relation to new renewable energy developments, where limitation of visual impact on the landscape is particularly important. Moreover, the possible cumulative loading implications of new projects for capacity of the existing transmission lines should be clearly established to avoid unforeseen needs for later upgrading of overhead lines with a resulting risk of adverse visual impact. It is not enough to leave these matters in the hands of the District Network Operator.
1420	NFU Cymru (Dafydd Jarrett) [3285]	POLICY PS7	Object	The NFU would like to make the following general comments about the Development Management Policies included in the draft Plan. Opportunities that would not prevent the following development:  * provision of renewable energy which is appropriate in terms of its scale and design to its location.

#### **ADN1 – On-Shore Wind Energy**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
71	Nefyn Town Council (Liz Saville Roberts) [2710]	POLICY ADN1	Object	Nefyn Town Council is firm in its opinion that it is necessary to adhere to policy C26 involving the size of wind turbines in the Llyn AONB, and that an increase in the size of wind turbines should not be permitted.
74	Mr David Coucill [2629]	POLICY ADN1	Object	Wind turbines of 50m to tip height cannot be classified as small. This is especially true in the relatively flat landscape of Anglesey where a 50m structure, the height of ~8-storey building, can be seen from miles around.  After a consultation, in which almost 10% of the population of Anglesey participated, Anglesey County Council adopted a minimum separation between turbines and domestic properties of 20 times tip height. This has been completely ignored.  The effect of wind turbine noise on neighbouring properties is ignored in Gillespie's report even though it is recognised as a problem in other areas, e.g. Devon.  The SPG on wind turbines approved by Anglesey Council after extensive consultation should not be ignored and should be incorporated into the Deposit Plan.
75	Mrs Carolyn Williams [2721]	POLICY ADN1	Object	I am objecting to Policy ADN1. Most of Gwynedd is protected from developments by being a National Park (Snowdonia) or SLA (Lleyn Peninsular). Only Anglesey is open to widespread abuse.  8000 islanders, who signed a petition in 2012, calling for a 1.5 km separation distance between homes and industrial commercial turbines and the Supplementary Planning

ime Sectio	n Type	Summary of Representation / Change(s) to Plan
		Guidance is thrown out.
		I reject the wind energy policy as presented in this flawed, undemocratic and unsustainable Plan.
		The 1.5 km separation distance and the Supplementary Planning Guidance on Onshore Wind Energy should be retained.  No more 50 metre (large) wind turbines. We are swamped.  Anglesey's Councillors should listen and support their local communities, who don't want 50 metre plus wind turbines blighting the landscapes of Anglesey, and so must reject this draft wind energy policy.
		Our Communities have not consulted or agreed to be an energy island.
Nigel Ayliffe POLIC 339] ADN1	Y Object	1. Distance from Residential Property Considerable consultation took place on this point both with the public and the Councillors in the drafting and agreeing of the Supplementary Planning Guide. Despite this evidence of the will of the people it has not been included in the above Plan. It should not be ignored. The agreed minimum distances should be entered.
		2. Repowering of existing wind farms/turbines. The planning considerations for these should be the same as those for new proposed turbines otherwise the damage already done to the countryside and tourist attractions will be compounded with the new much larger turbines.
Christopher POLIC arjot [2624] ADN1	Y Object	<ol> <li>Object to the classification of 50m wind-turbines as being 'small', this appears to be based more on power output, rather than height. The environmental and amenity impact is directly proportional to the height of the wind-turbine, not the power output. 50m wind-turbines are not 'small' relative to the size of dwellings and the local environment. The classification should be redefined to accurately reflect their scale relative to residences and the local environment. *</li> <li>The Anglesey SPG on 'Onshore Wind Energy' recommended far more suitable distances from residences to wind-turbine the JLDP should conform to the SPG separation distances.</li> </ol>
Mark Edwards POLIC 769] ADN1	Y Object	Wind turbines have been proven to discourage tourism. NW Wales is highly dependent on the business provided by its visitors. Any thing other than micro scale turbines must therefore be ruled out.  The definition of a "small wind turbine" at up to 50m high o/a is badly judged. This is around 10x the ridge height of a traditional cottage.
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				Distances from residences in table 14 are about 50% of what is reasonable.
				The words "significant harm" in clauses iii and iv of the conformation criteria fails to show due respect and consideration for the needs of local residents and needs amendment.
				Overall limitation to micro and domestic turbines requires amendment of items 1, 2 and 3.
				Table 13 needs to be changed to give realistic height categories.
				Distances in Table 14 should be doubled.
				Amended wording for criteria iii. and iv. given.
166	Mr DAVID THOMAS [2775]	POLICY ADN1	Object	After much consultation there is an SPG which has been agreed and accepted but does not seem to be implemented in the Deposit plan Why? There should be a minimum distance from residential buildings specified. What is there now to stop more turbines being erected across Anglesey? The island in my opinion is already saturated with wind turbines and any more will ruin its character and attraction for tourist to come and visit.
				SPG provisions for wind turbines to be implemented.  A distance of at least 1.5 km between residential property and a turbine to be specified.
177, 194	Rod Dixon [2774], Mrs Irene Stott [2780]	POLICY ADN1	Object	ADN1 point 2. This should refer to the agreed Onshore Wind Energy SPGs of both Councils which state that the maximum tip height for the designated sizes of turbines will be: micro - 11m; small - 20m; medium - 65m; large - 135m. The councils were assured that these would be carried forward to the LDP, they have not been and the new categories are much increased over the originals.  Revert to old agreed sizes
201	Kingsbridge Caravan Park (Mr Andrew Bate) [2778]	POLICY ADN1	Object	Onshore wind turbines on Anglesey should be restricted to "Domestic" use and located near the associated dwelling.  Proliferation of larger machines around the island will have a negative impact on the landscape and may cause visitors to seek alternative less industrialised locations.  There will be significant visual impairment with the construction of additional transmission lines associated with extra generation capacity from Wylfa B.

Generation capacity from proposed offshore wind farms and Wylfa B will far outweigh that which onshore generation could seve so preserve the onshore landscape of "unspoilt countryside and coastline" as highlighted in the Visitor Economy Introduction.	Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
countryside and coastline" as highlighted in the Visitor Economy Introduction.  Restrict onshore wind turbines to "Domestic" grade.  In 2012/13 Anglesey Council compiled, consulted and agreed a SPG which specified limits on the growth of wind turbines. This Deposit Plan completely ignores those decisions.  Note that the set is provision of the SPG with respect to wind turbines and passed in 2012/13 to replace the JLDP provisions contained in the Deposit Plan.  Restrict onshore wind turbines to "Domestic" grade.  In 2012/13 Anglesey Council compiled, consulted and agreed a SPG which specified limits on the growth of wind turbines. This Deposit Plan completely ignores those decisions.  I want to see the provisions of the SPG with respect to wind turbines and passed in 2012/13 to replace the JLDP provisions contained in the Deposit Plan.  I object to the plan as it classifies up to 3, 50 metre wind turbines as small scale. The plan also states most of Gwynedd is protected from developments by being a National Park (Snowdonia) or SLA (Lleyn Peninsulan). Only Anglesey is open to wide-spread abuse, and it will be abused. There was an an agreement that minimum distance would be considered by Anglesey planners and councillors after the 2013 SPG was adopted due to 8,000 strong petitions demanding a minimum distance. Once again a minimum distance has been ignored. So much for democracy!  Ban turbines from the AONB. No turbine higher than 11.1 in the SLA and Landscape of Special Historical Interest. Listen to the advice of the AONB Consultative Committee which considers that it is necessary to adhere to the above in order to conform to the Council's statutory duty under the Countryside and Rights of Way Ard 2000.  ADN1 and the criteria in the associated Table 13 appear to restrict many wind energy developments. Judger than 50 MIN to within SSAs and urban/industrial brownfield sites. This would be incontravention of TAN8, which states, "Link Assembly Government would support local planning authorities in introducing local					
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POLICY ADN1					countryside and coastille as highlighted in the visitor Economy introduction.
Mr Owain Evans [2837]					
Sample   Policy   ADN1   Policy   ADN1   Policy   ADN1   I want to see the provisions of the SPG with respect to wind turbines and passed in 2012/13 to replace the JLDP provisions contained in the Deposit Plan.					
Liwant to see the provisions of the SPG with respect to wind turbines and passed in 2012/13 to replace the JLDP provisions contained in the Deposit Plan.	000	Mr Owain Evans	POLICY	Obia at	on the growth of wind turbines. This Deposit Plan completely ignores those decisions.
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Mr Barry Roberts [2878]   POLICY ADN1   Object   Cyfeillion Llýn (Mr Sian Parri) [2871]   POLICY ADN1   Object   Cyfeillion Llýn (Mr Sian Parri) [2871]   POLICY ADN1   Object   Cyfeillion Llýn (Mr Sian Parri) [2871]   Object   Cyfeillion Llýn (Mr Richard Mills) [2937]   Object   Cyfeillion Llón (Mr Richard Mills) [2937]   Object   Cyfeillion Llón (Mr Richard Mills) [2937]   Object   Obj					
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Môn a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]  CSJ Planning Consultants Ltd (Mr John Cocking) [1558]  John Bircham [2989]  Jason Bowes  Môn a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]  Would be in contravention of TAN8, which states, "the Assembly Government would support local planning authorities in introducing local policies in their development plans that restrict almost all wind energy developments, larger than 5 MW, to within SSAs and urban/industrial brownfield sites." We also consider ADN1 to be unsound in failing to take adequate account of the importance of community-based/-owned projects and repowering schemes.  The wording of the first line is unnecessarily restrictive. The wording of points 1, 2 and 3 is unnecessarily prescriptive. Both should be amended to reflect a more flexible and proactive approach to wind farm development. Applications should be determined on their merits on a case-by-case basis  Wind turbines have an unacceptable visual impact on a rural countryside. The concrete base for each turbine will be forever long after turbines have gone with the grants.  Although renewable wind energy is needed it is not needed in this format. Small wind					
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Jason Bowes POLICY Object Although renewable wind energy is needed it is not needed in this format. Small wind	531			Object	
()high		1 2			
	532	[2991]	ADN1	Object	turbines are not 50m. Maybe 10-15m. 15-30m turbines to be sited at least 1.5km from

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				nearest dwelling. 30m turbines sited as wind farms as far from view as possible. I would not like Anglesey to be ruined by these monstrosities. Let farmer's site small turbines 10-15m for their own needs.
535	Brian Lee [2993]	POLICY ADN1	Object	The SPG should be honoured     The existing height classification should be accepted     A separation distance of 1.5km should also be accepted     The JLDP should be re-written acknowledging the wishes of Anglesey residents
538	Janis Evans [2994]	POLICY ADN1	Object	The Deposit Plan ignores the Anglesey Council SPG which specifies limits on the growth of wind turbines. The Plan classifies 50 metre high wind turbines as 'small-scale'. The island's entire interior could be transformed by developments of this scale and type if the Plan proceeds. No other huge industrial scale developments are given such free reign.  8000 islanders who signed a petition in 2012 calling for a 1.5km separation distance between homes and industrial commercial turbines are being ignored.  I want the provisions of the SPG with respect to wind turbines to replace the provisions contained in the Deposit Plan.
539	David Talbot [2995]	POLICY ADN1	Object	<ol> <li>The Plan classifies 50 metres high wind turbines as 'small scale', over 6 times the height of an average house!</li> <li>Most of the turbines in the existing wind farms in the north of the island are now 'small'. The Island's entire interior can be transformed by developments of this scale and type if the Plan proceeds.</li> <li>8000 signatures on Anglesey expressed the wish of a minimum of 1.5km separation distance with large wind turbines and residency. None is given.</li> </ol>
540	Tudweiliog Community Council (Mrs Glenys Peters) [1236]	POLICY ADN1	Object	Recommend that turbines that are higher than 15m should not be permitted in Gwynedd, and none in an Area of Natural Beauty. Tudweiliog Community Council objects to every wind turbine within the Llŷn AONB and every application for a turbine higher than 11m within the boundary and views of the AONB.
541	Mrs Pam Lee [2725]	POLICY ADN1	Object	The following should be accepted: 1) The 2012/13 SPG 2) A separation distance of 1.5km 3) Reclassification of 'small-scale'
542	Dr Stephen Baker [2623]	POLICY ADN1	Object	The plan classifies 50metre high turbines as 'small scale' This means that most of the existing Anglesey turbines are 'small' - unreasonable Public consultation seems to be ignored
543	Richard & Sheila	POLICY	Object	We object to the resizing criteria of turbines - 50 m high now being considered 'small scale'.

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	Perry [2996]	ADN1		In fact these are very visible from many locations across the north part of the island, the coast path and AONB. Visitors come to the island to enjoy the landscapes of the AONB/coast and are providers of much of the vital summer income for Anglesey's tourism businesses. They will not enjoy their visit if all they can see across the island are far taller wind turbines, more widely spread than at present.
544	Mr Stephen Kneale [2776]	POLICY ADN1	Object	This Plan completely ignores decisions which were agreed after exhaustive public consultation. The Plan classifies 50m high win turbines as 'small-scale' which is absurd. The existing industrial Rhyd-y-Groes Amlwch wind farm would be "small-scale". Anglesey would be ruined as a toursit destination if further developments on this scale were allowed on the island. The height categories should be retained as specified in the existing SPG. The acceptable distance from dwellings should also be retained as specified in the SPG.
545	Mrs Candy Jones [2758]	POLICY ADN1	Object	50m high is not a small wind turbine. The SPG is being ignored. The whole interior of the island could be covered in 50m turbines if the Plan is adopted.
546	Elfed Jones [2999]	POLICY ADN1	Object	Small turbines should be 20m high, as specified in the SPG, not 50m high. The SPG is being ignored after an un-precedented response. This Plan would turn the interior of the island into one big wind farm of 'small' 50m turbines.
547	Mr Nigel Ayliffe [2639]	POLICY ADN1	Object	Paragraph 7.2 onwards does not reflect aspects of the supplementary planning guidance which was produced after lengthy consultation with residents in 2012/13. The major points are: i) a minimum separation distance between resident's houses and industrial turbines of 1.5km. ii) Classifying 50m turbines as small is incomprehensible. It was agreed by residents that 'small' wind turbines (20/25m) should be allowed for farmers etc. 50m is not small, it is large industrial.
548	Mr N.F. & Mrs C.W. Roberts [3000]	POLICY ADN1	Object	Common features are noise, the obvious blight on a landscape of natural beauty, and the significant effect on local businesses and local employment in catering and tourist industries. Turbines of the height proposed (up to 50m) will destroy views of the landscape and affect tourism.
549	Mrs M.A. Ayliffe [3001]	POLICY ADN1	Object	a) 50 metre high turbines are not classified as small in the SPG. They are 20/25m high b) The north end of the island has most of the 'small' turbines in clusters which will cause problems for the local residents as set out in the SPG if they are increased to 50 metres c) That the council is ignoring the SPG of 2012/13 which was decided upon after exhaustive public consultation.
550, 552,	Mr DJ & Mrs JL Hart [3002], Gareth Porter	POLICY ADN1	Object	The Plan classifies 50m high wind turbines as 'small-scale', over 6 times the height of an average house. Most of the turbines in the existing wind farms in the north of the island are now 'small' and the island's entire interior can be transformed by developments of this scale and type if the plan proceeds. The SPG on Onshore Wind Energy, subject to exhaustive

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554,	[3004],			public consultations, is being thrown out.
559, 576,	Ralph Morris [3005],			
578, 688	Jonathon Tivy- Jones [3010], G. Warren [3018], Julia Dobson [2979],			
	Mrs Frances Nigogosian [3068]			
551	Robert MacAulay [3003]	POLICY ADN1	Object	Paragraph 7.2 of policy ADN1 will have the effect of unconstrained building of large wind turbines across much of Anglesey. The two largest 'industries' on the Island are farming and tourism and the proposed policy will serve to destroy or seriously reduce the latter by ruining the peace and (largely) uninterrupted vista's for which most tourists come. Whilst the proposal may produce a little more green energy for the UK, it will only serve to enrich a few to the huge detriment of the rest of the island's inhabitants and visitors
555	Isabel Hargreaves [3006]	POLICY ADN1	Object	In 2012/13 Ynys Môn agreed an SPG with specified constraints on wind turbines which the Deposit Plan has ignored. It has re-cast 50m turbines as 'small', the implications of this for future wind turbine development is huge and will have a deleterious effect on the natural rural beauty of the Island. Potential impact on tourism and quality of life of Ynys Môn residents will be significant and negative.  8000 residents responded to the SPG consultation calling for a 1.5km separation between commercial turbines and residents.  The provision of the 2013 SPG to replace the provisions within the Deposit Plan.
556	Vicky Gregory [3007]	POLICY ADN1	Object	Onshore wind energy of the Plan states that 'small-scale wind energy proposals WILL be granted outside the AONB, SLA and the setting of the National park and World Heritage Site'. The Plan's classification of 'small scale' win turbine is 50m in height which is considerably higher than the classification held in the 2013 SPG. This has worrying implications for the island's future with the possibility of unspoilt landscapes being dramatically changed for years to come and areas in the north will continue to be industrialised on an even larger scale and dominate the landscape.
557	John Alexander [3008]	POLICY ADN1	Object	The SPG and the amendments subject to consultation are being ignored. The reclassification of the scale of size of wind turbines will enable repowering smaller turbines in the north of the island. It will enable turbines to spread across the whole county (this is

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				against TAN8 guidelines. No mention of buffer zones/wildlife corridors that can protect the
				key AONB areas. The SPG is being ignored. The distance of turbines from properties that
				are quoted and would trigger an assessment are not acceptable and do not meet the
				public's requirements.
				The SPG that was passed in 2012/13 plus the amendments should replace the JLDP provisions in the Deposit Plan. Health and safety issues with regard to noise need to be
				properly taken into consideration. A buffer zone and wildlife corridor from the south to the
				north east of the island needs to be created. Turbines should not be permitted in this
				area.50m turbines are not small and they are unsuitable for the topography of this island.
				The Plan classifies 50 metre high wind turbines as 'small'. If the Plan proceeds, almost the
				whole of the island will be covered by developments of this scale. The SPG on onshore
				wind energy is being dismissed.
				Lucent to one the previous of the CDC with respect to wind turbines percent in 2010/12 to
				I want to see the provision of the SPG with respect to wind turbines passed in 2012/13 to replace the JLDP provision contained in the Deposit Plan.
558	Sarah Irlam [3009]	POLICY ADN1	Object	replace the SEDF provision contained in the Deposit Flan.
000			Object	
				The landscape sensitivity and capacity for Anglesey, Gwynedd and SNP needs to be
				adhered to.
				The Deposit Plan must protect these special areas and more should be included,
				particularly the distance from AONB, SSSIs, SLAs, SACs.  No attempt made to differentiate between Anglesey and Gwynedd in terms of constraints
				imposed by topography on planning applications emphasised by National Park and AONB.
		DOLLOV		These impacts directly on land available for turbine planning applications. Approximately
560	Mr John E.	POLICY ADN1	Object	20% of Gwynedd is not covered by either National Park or AONB. Approximately 80% of
	Williams [3013]	ADNI		Anglesey is not covered by its AONB. The burden of repeated applications the energy
				companies therefore falls on Anglesey with the coast implications and the reduction of
				services borne by the Anglesey rate payer.
				The provisions of the SPG have not been incorporated in this Deposit Plan. Nearly 8000
	Dr B L Davies			residents signed a petition against the further development of commercial scale (>15m to tip) wind turbines on the Island.
561,	[3012],	POLICY		up) with tarbiffes of the Island.
572	Mar E O Da da	ADN1	Object	New wind turbine development outside the area specified in para. 7.2.30 of the Plan should
	Mrs E C Davies			be restricted to domestic scale turbines (<15m to tip) and should relate well to existing
	[3017]			settlements/buildings and not scattered over open countryside.

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				The only exception would be the repowering of existing turbines which should be replaced
				one-to-one by more efficient and less noisy turbines of the same height.
562	Christopher and Eleni Marjot	POLICY	Object	Defining 50m wind turbines as 'small' is incorrect. They may be 'small' in terms of power output, but are NOT 'small' in proportion to residential properties and the landscape. The
	[3011]	ADN1	2.2,2.2	classification terminology needs to be amended so that it is not deceiving.
	Christopher and	DOLLOV		The Anglesey SPG on 'Onshore Wind Energy' recommended far more suitable distances
564	Eleni Marjot [3011]	POLICY ADN1	Object	from residences to wind turbines. These have not been applied in the draft JLDP. I want the JLDP to conform to the recommendations for separation distances to follow that of the
	[5011]			Anglesey SPG.
	lanathan Tim			I object that the Supplementary Planning Guidance on Onshore Wind Energy SPG 2012/13
565,	Jonathan Tivy- Jones [3010],			which was agreed after much public consultation is now ignored. Also ignored, is the petition by 8000 residents in 2012, who wanted a 1.5 km separation distance of commercial
300,	001103 [0010],	POLICY	Object	turbines, from residential areas for reasons of safety and aesthetics. This deposit plan has
567	Mrs Erica Cooper	ADN1		now re-classified 50 metre wind turbines as small-scale! How can they be called small when
	[3015]			they are twice the height of the Marquis of Anglesey's Column? This plan, therefore, will
				pave the way for Anglesey's beauty to be disfigured, by littering it with turbines.
				In 2012/2013 Anglesey Council compiled, consulted and agreed an SPG which specified certain limits on the growth of wind turbines. This deposit plan does not comply at all with
	Mrs Nonette Tim	POLICY		these decisions. This new deposit plan would reclassify wind turbines already present on
566	Mrs Nanette Tivy- Jones [3014]	ADN1	Object	the north of the island as small and would allow the interior of the island to be exploited for
	001100 [0014]	7.0111		development. I strongly object to this, as it will have catastrophic effects on the island's
				significant tourist economy and wildlife. This level of flexibility is not given to other industrial scale developments of this kind on the island.
				Table 14 is unrealistic. Uses visual impact criteria which do not include cognitive,
				psychological and mechanical implications. The separation distances have been tailored to
500	Mr John E.	POLICY		fit the largest possible turbines into the confined areas available on Anglesey and Gwynedd
568	Williams [3013]	ADN1	Object	without adequate reflection of practices elsewhere in Britain and abroad. This section needs to be re-titled as a Physical/Mental Impact Zone and the concerns of the 8000 rate payers
				who signed the petition of 2012 adequately reflected.1.5km separation distance should be
				adopted.
				The plan ignores the previously agreed SPG limiting the growth of wind turbines. It will, if
F-7-7	Trevor Jones	POLICY	Ohiost	adopted, give free rein to unfettered development of large win turbines on an industrial
577	[3019]	ADN1	Object	scale. It cannot be allowed that this Guidance should be ignored.  Changes: the proposals regarding the height and distribution of wind turbines contained
				therein be removed and replaced by the recommendations as stated in the SPG.
579	Dr Morag	POLICY	Object	The proposals completely ignore the 2013 SPG on onshore wind turbines. In particular the
513	McGrath [231]	ADN1	Object	sizes of turbines permitted in the various categories have been greatly increased.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Changes: The categorisation of onshore turbine size in the 2013 SPG and the relevant proposals should be reinstated.
580	Dr Morag McGrath [231]	POLICY ADN1	Object	The 2013 SPG set out a minimum separation distance from residential or tourist properties of 500m or 20 times the tip height of the blades, which the greater. The SPG has been totally ignored in this document. Table 14 refers only to the visual impact whereas the problem of noise is also relevant.  Change: Reinstate the policies concerning minimum separation distances between onshore wind turbines and residential or tourist properties given in the 2013 SPG.
581	Nigel Peacock [3021]	POLICY ADN1	Object	Wind turbines other than domestic wind turbines should not be permitted anywhere in the plan area.  Changes: the plan should give protection to the environment and countryside not only in relation to the provision of holiday accommodation but also in relation to the construction of much more damaging wind turbines.
582	Mr David G. Thomas [3020]	POLICY ADN1	Object	I object to the parameters set for wind turbines on Anglesey.  They do not include the restrictions agreed in the Strategic Planning Guide-lines passed by A.C.C. On 24th. January 2013 and confirmed to be included in the LDP by the Joint Local Development Panel on 7th. March 2014. The LDP does not have regard to the effect of wind-turbines on the sky-line of Anglesey and the tourist industry on which it is so much dependent. Restrictions should be clear to avoid inappropriate applications and expensive appeals. The Plan as drawn is ripe for exploitation by rich developers
583	Mr Ralph Morris [3022]	POLICY ADN1	Object	Anglesey Council agreed a SPG which specified limits on the growth of wind turbines. This plan completely ignores those decisions. The plan classifies 50 metre high wind turbines as small-scale, over 6 times the height of an average house! As if by magic, most of the turbines in the existing wind farms in the north of the island are small, and the island's entire interior can be transformed by developments of this scale and type if the plan proceeds. No other huge industrial scale developments are given such free rein.
584	Gillian Coates [3023]	POLICY ADN1	Object	The Deposit Plan will turn Anglesey into a giant wind farm. I object to 50 metre wind turbines being defined as 'small-scale'.  Change: I want to see the provisions of the SPG with respect to wind turbines, and passed in 2012/2013, to replace the JLDP provisions contained in the Deposit Plan.
585	Mr David G. Thomas [3020]	POLICY ADN1	Object	The LDP does not have regard to the effect of wind-turbines on the sky-line of Anglesey and the tourist industry on which it is so much dependent. Restrictions should be clear to avoid inappropriate applications and expensive appeals. Change: i) Insert "Small-scale and" before "medium scale" ii) "Micro-scale" - delete "and small-scale" wind turbinesoutside the AONB insert "or a buffer zone of two kilometres", SLA iii) Policy AND2 "All proposals should conform to the following criteria: vii At end after "agreed" Add "before the commencement of any works".

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
586, 587	Philip Tolman [3024], Honey Tolman [3025]	POLICY ADN1	Object	The Plan ignores the SPG which sets limits on wind turbines. Absurdly, the Plan classifies 50m turbines as small scale. Anglesey's rural beauty could be destroyed forever by massive developments that would never be permitted for other industrial projects. The SPG adopted a 1.5km separation distance between homes and large turbines. This is ignored.
588	Janet Smith [2990]	POLICY ADN1	Object	Objection: To the re-classification 50 metre high wind turbines as 'small-scale'.  Objection: To the consequence of this re-classification that existing wind farms in the north of the island would be 'small', opening the way for the transformation of the Island to large scale industrial development.  Objection: The Supplementary Planning Guidance (SPG) on Onshore Wind Energy, subject to exhaustive public consultations, is being thrown out.  The provisions of the SPG with respect to wind turbines and passed in 2012/13 to replace the JLDP provisions contained in the Deposit Plan.
589, 590	Dorothy Prestwich [3026],  Mr & Mrs K Street [3027]	POLICY ADN1	Object	Object to large (50m +) turbines being built all over the Island. SPG has been totally ignored.
591	Campaign for the Protection of Rural Wales (Mrs Maureen Parry Williams) [1441]	POLICY ADN1	Object	Policy ADN1 is flawed planning policy for Anglesey and is unsound.  A policy that restricts the areas where new wind turbines can be built is essential for Anglesey.  The SLA status must be restored to most of the island's interior landscape.  The heights of permissible new turbine developments must be reduced to those listed in the 2012 SPG Consultation.  There must be Buffer Zones between turbines and residential properties as per the 2013 SPG.
593	Lawrence Cotter [3028]	POLICY ADN1	Object	The 2013 SPG is ignored. 50 metre wind turbines which are double the height of the Marquis of Anglesey's Column, now classed as 'small-scale', with no public consultation. Change: the provisions regarding onshore wind turbines that were agreed in the SPG 2013 document should be upheld and maintained in the Plan.

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596 & 601	Cwm Cadnant Community Council (Mr Alun Foulkes) [1273]	POLICY ADN1	Object	Policy ADN1 in its present form does not show good judgement. It will have a detrimental impact and is not a sustainable environmental, social, economic and cultural land use plan for Anglesey.  Point 1 should restrict turbine height to 50 metres to blade tip. Point 2 should restrict turbine height to 15 metres to blade tip. Point 3 should restrict turbine height to 11.1 metres to blade tip.  The criteria listed in i) to vii) should be expanded to offer better protection to local as well as national designations and assets.
603	John & Ann Baum [3031]	POLICY ADN1	Object	The 2012/2013 SPG on Onshore Wind Energy is being ignored.  50 metre high turbines are being classified as small-scale - at six times the height of an average house.  Many existing turbines on wind farms on the island would be classed as small, thus opening up possibilities for extensive industrial type developments.  We should like the 2012/2013 SPG provisions applied to wind turbines to replace the JLDP proposals contained in the Deposit Plan.
608	Mr Paul Madden [3032]	POLICY ADN1	Object	As worded criteria (iii) is bad English and it would appear that words may of have been omitted and the word 'significant' should be dropped.  The Health Impact Assessment refers to minimising potential health impact caused by noise but not detailed policies in regard to health impact are included within this section.  There is no recognition that wind turbines and their proximity can result in ill-health for residents.  The report on separation distances is concerned only with landscape and visual matters.  The Council should of have commissioned an independent report to deal with ill-health from noise emissions.
690	Mr John Irlam [3069]	POLICY ADN1	Object	Minimum separation distances should be considered as noted in 'Guidance on the Application of Separation Distances from Residential Properties Study'. Wind turbines in close proximity to dwellings would have an adverse effect. The JLDP should recognise the separation distances.
694	Mrs Kate Barker [2857]	POLICY ADN1	Object	The document is unsound because some policies appear to be made on inaccurate generalisations, and there is not enough detail on some issues, for example, the importance of the landscape around heritage assets - there is no mechanism to show these areas on the constraint maps. The document is also unsound because it does not take into account

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				previous public consultation responses on the LDP where 800 people wrote in about their concerns in wind turbine development in 2012.
				<ol> <li>Public consultation period should be extended.</li> <li>Maps should be re-issued so they do not pixilate when you zoom in.</li> <li>Height of wind turbines not exceeding 15m to tip height should replace 50m stated in the plan.</li> <li>A set back distance from dwellings should be observed of 1.5 or 2 kilometres because of health and loss of amenity.</li> <li>We need a mechanism and clear route for appeal against the grant of approval in planning decisions other than through the courts.</li> <li>The area surrounding the heritage asset should also be shown as a protected area on the constraints maps, not the just the asset itself.</li> </ol>
705	Lesley Alexander [3073]	POLICY ADN1	Object	Community Council views and objections to the spread of medium and large industrial turbines are ignored in the JLDP. Wildlife corridors and buffer zones around the AONB are not included. The effects on tourism and visual impact on the landscape will be catastrophic on Anglesey unless the JLDP is amended. The separation distance from domestic dwellings is suggested to be 400m from a large turbine! A petition in 2012, done as part of the SPG consultation asked for 1.5km.  The deposit plan must be changed to include the SPG amendments on turbines, their height classification, separation distances and effect on tourism, wildlife and health of local inhabitants e.g. noise.
706	Gwyneth Jones [3074]	POLICY ADN1	Object	I object to the scale proposed in relation to the height of proposed turbines within a landscape such as that of Anglesey, especially given the developments that have already taken place. I would welcome adopting the previous policies found in the 2013 SPG
711	Anglesey Against Wind Turbines (Ms Mairede Thomas) [318]	POLICY ADN1	Object	Policy ADN1 is flawed, unjustifiable and unsound for the reasons given in Section 2c of the JLDP representation form.  There should be separation distances between turbines and homes. Especially to lessen the effect of noise on housing in the vicinity.  The SLA status should be restored to the interior landscapes of Anglesey.  Table 13 should use the turbine heights used in the 2012 SPG.  Any policy on wind turbine development must take account of the depressive economic impact on houses and other property and on the island's economy and its tourist trade in

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				particular.
				The protections for tourism amenity contained in the 1996 Ynys Môn Local Plan must be included in any policy regarding wind turbines.  The term 'Wind Turbines' rather than 'Windmills' should be used. The term 'windmills' is associated with corn mills.
713	Mr John Eric Williams [2746]	POLICY ADN1	Object	Paragraph 2. I completely disagree with the proposal to permit wind turbines outside the AONB, the National Parks and SLAs if these are visible from these sites. This type of development could be just as harmful to the site.
				Paragraph 3. I completely disagree with the proposal to permit domestic wind turbines within the AONB, National Parks and Heritage Sites.
				These recommendations are contrary to existing policies and weaken and undermine efforts to safeguard the heritage that is in our care.
894	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY ADN1	Object	A limit of 11m rather than 15m height for domestic turbines would accord better with permitted development limits. Difference between capacity and output should be clarified. We oppose removal of the present progressive and clearcut policy in Gwynedd of excluding wind turbines from the AONB. Support the proposal to limit turbines to domestic size in SLAs - should emphasise this includes within AONB's. SLA coverage should be extended to buffer some areas of the AONB which are less protected in N.Llyn and the Menai shore. Height limits should apply in repowering. Residential visual amenity distance criteria should be strengthened. Farm diversification criteria from the Gwynedd SPG should be included in the policy. There should be more reference to archaeological impact and a definition of community-based projects. Suggested changes:  ADN1/2: "outside the AONB, SLA, and the SETTINGS OF THE AONB, National Park"  ADN1/3 "In the AONB, SLA and the SETTING OF THE AONB, National Park and World Heritage Site"  Extend SLA coverage to provide more effective buffer areas for designated area. In area LCA GU10 follow LSCS guidance in limiting turbines to 'micro' scale. ADN1/3 delete 'the AONB'  Add ADN1/4 "Wind turbine applications in the AONB will be refused"  4.17 Para 7.2.30 Insert 'acceptable'? 'The setting of the National Park and World Heritage Site limits the ACCEPTABLE"  Table 13: Domestic height limit, clarify kW as a capacity not output; reduce 'small' indicative output level.  Add criteria related to farm usage limits, archaeological impact

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				Modify residential amenity distance limits.
950	AONB Joint Advisory Committee (Cynghorydd Gruffydd Williams) [3090]	POLICY ADN1	Object	I believe that the current policy of having no turbines in the AONB (C26) should be adhered to.  Also, refuse turbines higher than 11m within visibility of the AONB.  The term 'turbine' should be used, rather than 'mill' which is different.  I believe that criterion 2 should refer to safeguarding the setting of the AONB.  There is concern about the categories and designating developments under 5MW as 'Small'.
686, 700	Mr RONALD BOYLE [2672], Linda Boyle [3071]	POLICY ADN1	Object	<ol> <li>What will be the justification for 'trigger' mechanisms to determine cumulative impact? Who decides?</li> <li>The negative visual impact of one wind turbine in an area where none previously existed could be considered as a 100% deterioration - how/who will determine the level of impact?</li> <li>The downgrading of turbine heights, so that 50m is now considered small is a serious weakening of previous guidance, as is the reduction in visual amenity assessment distances.</li> <li>8000 signatories on Anglesey, expressed the wish of a minimum of 1.5km separation distance with large wind turbines and residences, none is given.</li> <li>Trigger factors to determine visual, amenity cumulative impact etc. must be made transparent.</li> <li>There must be a separation distance and any permitted should carry a bond to enable decommissioning.</li> </ol>
707	Susan Talbot [3075]	POLICY ADN1	Object	<ol> <li>The plan classifies 50 metres high wind turbines as 'small-scale', over six times the height of an average house!</li> <li>Most of the turbines in the existing wind farms in the north of the island are now 'small', so the island's entire interior will be transformed by developments of this scale if the plan proceeds.</li> <li>8000 signatories on Anglesey expressed the wish of a minimum of 1.5km separation distance with large wind turbines and residents. None is given.</li> </ol>
64	Mr M Saxton [2647]	7.2.32	Object	50 metres high cannot possibly be described as small scale, I. E. 3 x50 metre turbines, each as high as a 12 or 13 storey tower block of flats is actually ENORMOUS, not small. There seems to be no consideration given to the adverse health effects of this useless form

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				of energy. We expect our local council to respect and preserve the well being of its
				constituents, so, much greater separation distances have to be legislated for
				No large 50 metre turbines to be described as small ones.
				Much greater separation distances to assist in the health and well being of anyone
				unfortunate to reside within a couple of miles of any wind turbine
				The definitions of types of wind turbines have been changed drastically from that published by IoACC in the Supplementary Planning Guidance. The effect is to put huge wind turbines into the Medium category when previously they would have been regarded as Large.
	Institute of Biology		Object	Numbers of turbines in each category are not required as it implies that such quantities will be acceptable when even one turbine is an eyesore.
85	(Ms Elspeth Wagstaff) [1496]	7.2.33		Please reinstate the following wind turbine definitions as from your own document: Microgeneration: 10 - 18 metres
				Small: 12 - 25 metres
				Medium: 15 - 50 metres
				Large: over 50 metres
				Delete numbers of turbines from the table.
		7.2.33	Object	The adopted Anglesey SPG stated that Medium turbines were 15 - 50 M total height the proposed JDP has re-designated this as Small.
91	Mr Jon Cottrell [2734]			The adopted SPG stated that Large turbines started at 50+ M total height the proposed JDP has re-designated this to start at 110 M - twice the height adopted in the SPG!
				Keep to the agreed SPG and listen to the 8000 residents of Anglesey who signed the partition in 2012.
178,	Rod Dixon [2774],			The agreed Onshore Wind Energy SPGs of both Councils state that the maximum tip height for the designated sizes of turbines will be: micro - 11m; small - 20m; medium - 65m; large - 135m.
178,		7.2.33	Object	The councils were assured that these would be carried forward to the LDP, they have not
195	Mrs Irene Stott [2780]	7.2.33 Ob	Object	been and the new categories are much increased over the originals.
				Revert to original agreed size bands as agreed in SPGs.i.e micro - 11m; small - 20m; medium - 65m; large - 135m.
569	Mr John E. Williams [3013]	7.2.33	Object	Definition of scale seems to have been drawn by the Energy Companies. Turbines larger than domestic or micro would transgress the criteria. The emotive use of the word 'industrial'

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				is avoided. Any turbine larger than 'micro' must be 'industrial' so the word should be re-
				instated. No mention of impact on tourism.
				Changes: Re-draft table 13 to reflect terminology which describes the turbines in relation to
				the topography of Anglesey. Reinstate the word 'industrial' to describe the function of
				turbines larger than micro. Include statement that any 'industrial' turbine development would not be considered as favourable to tourism.
				Any wind turbine that is not domestic, should be properly described as 'industrialised', so
	A La NACIU			that its true purpose be evident. Object to the redefining of medium-sized units as 'small' for
573	Angela Williams	7.2.33	Object	the reasons I have outlined, and the use of the word 'micro' to describe a >65 ft structure.
	[3016]			Changes: reinstate correct and helpful terminology, to distinguish domestic units and
				industrialised commercial units. Amend table 13 to reflect realistic size description.
	Welsh			Table 40. The of the construction of the construction of the land of the construction
1066	Government (Mr	7.2.33	Object	Table 13 - Two of the supplementary criteria are very similar 'large/ very large', clarity
	Mark Newey) [1561]			required on the difference between these two.
	Welsh			While the Welsh Government supports the principle of securing sustainable community
1069	Government (Mr	7.2.34	Object	benefits for communities through voluntary arrangements, they must not impact on the
1069	Mark Newey)	7.2.34	Object	decision making process and should not be treated as a material consideration unless it
	[1561]			meets the tests set out in Circular 13/97.
		7.2.37		The published Separation distances published in the Anglesey SPG are being totally
92	Mr Jon Cottrell		Object	ignored and were more appropriate to Anglesey than these proposals
92	[2734]	1.2.31	Object	Keep to the agreed SPG and listen to the 8000 residents of Anglesey who signed the
				petition in 2012.
				The fact that Anglesey and Gwynedd are unalike topographically (as well as in terms of
575	Angela Williams	7.2.37	Object	areas of protection) must be borne in mind.
070	[3016]	7.2.07	Object	Change: Inclusion of a minimum distance between turbines/residential properties to prevent
				a free-for all situations on Anglesey.
				The separation distance is arbitrary and no better than the agreed distances in the existing SPGs which were supposed to be transferred to the LDP.
179	Rod Dixon [2774]	7.2.38	Object	Shos which were supposed to be transferred to the EDF.
				Use the separation distances as agreed in the Anglesey SPG
				The separation distance is arbitrary and no better than the agreed distances
	Mrs Irene Stott			in the existing SPGs which were supposed to be transferred to the LDP and should be
196	[2780]	7.2.38	Object	used.
				Lise the congration distances as agreed in the Anglesov SPC
				Use the separation distances as agreed in the Anglesey SPG

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan
571	Angela Williams [3016]	7.2.38	Object	The Gillespie Report is flawed by reliance on mathematical exactitude, rather than regarding the consideration of amenity as being people-based. Responses to the SPG of 2012/13 not considered.  Changes: i) Take consideration of the provisions of the SPG ii) separation distances in the Gillespie Report must be disregarded due to limitations of their research.

## ADN2 – Other Renewable Energy Technologies

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
182, 183	Ellesmere Sand & Gravel Company Limited [2686]  Lafarge Tarmac Trading Limited [2735]	POLICY ADN2	Object	Consider this policy is repetitive of national policy e.g. (not all landscapes are of the same value). The policy is too restrictive and not positive toward renewable energy technologies on existing mineral extractions sites or toward previously used land  Remove reference to development boundaries. Reference to temporary use of renewable energy sources on existing mineral extraction sites and positive emphasis toward renewable energy sources on previously used land
656	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY ADN2	Object	A separate explicit policy is needed for solar energy proposals which should prioritise use of commercial and farm building roofs, presume in favour of micro-solar field arrays in suitable sites and allow larger scale arrays in rural areas only outside the AONB and SLA and only in exceptional circumstances where the site has good natural screening and is not overlooked from nearby higher ground.  Change: Add explicit policy covering field solar arrays.
878	Mr John Tripp [252]	POLICY ADN2	Object	Carbon management not emphasised enough. Aim for zero emissions. Example - Wiltshire.
879	Mr John Tripp [252]	POLICY ADN2	Object	Solar panels - in mega scale, leave space between them for green life beneath, sheep grazing.
944	AONB Joint Advisory Committee (Cynghorydd Gruffydd Williams) [3090]	POLICY ADN2	Object	Other Renewable Energy Technology. It is believed that this policy is too indefinite in terms of proposals outside development boundaries, and that it should be strengthened.
1059	Welsh Government (Mr Mark Newey) [1561]	POLICY ADN2	Object	Policy ADN2 seeks to constrain non-renewable energy technologies to within development boundaries. This is overly restrictive and contrary to national planning policy. The energy assessment should provide the evidence to plan positively for all forms of renewable and low energy development.
93	Mr Jon Cottrell [2734]	7.2.45	Support	Solar PV is far more acceptable than wind energy because the shear height of the turbines will totally dominate the landscape for miles around and have a negative impact on tourism.

ARNA1 – Coastal Change Management Area

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
760	Bangor Civic Society 1 (Don Mathew) [2988]	POLICY ARNA1	Support	Policy ARNA1 Coastal Change Management is supported.
762	Bourne Leisure Ltd [2768]	POLICY ARNA1	Object	Policy ARNA1 is endorsed in principle. A policy that seeks to address shoreline management issues and objectives should fully reflect the outcomes of early engagement with landowners and also, ensure sufficient flexibility to allow for coastal landowners and business operators to relocate buildings and other facilities to open space within existing sites, or to land immediately adjoining their landholdings, where necessary due to coastal erosion. It should refer expressly to allowing landowners and business operators to contribute to funding for, and to retain coastal defence, in accordance with national policy for contributing to funding, as well as providing and maintaining defences.
771	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY ARNA1	Object	Criterion 8 significance of .(outside the indicative policy epoch up to 2025)? Clarify under what circumstances these non-residential developments (beach huts, shops, camp sites, etc.) will be permitted. We have been unable to locate online the CCMA maps. The maps in the Shoreline Management Plan show the location of coastal sections, but not the width of the affected management areas extending back from the coast. Criterion 3- Either cleared or made safe. (rather than .and.)
864	Haulfryn Group Ltd [2986]	POLICY ARNA1	Object	Paragraph 8(i) refers to camping sites but does not refer to holiday caravan sites. Where holiday caravan sites are located in CChMA it appears that the existing wording does not allow holiday caravan sites, but only camping sites. The wording should be amended to include holiday caravan sites.
865	Haulfryn Group Ltd [2986]	POLICY ARNA1	Object	Where holiday parks are located within the coastal change management area (within the AONB) and relocation of pitches is required due to roll back position from the shoreline, a minor increase in the number of pitches should be allowed to assist with funding the relocation of holiday pitches.
872	Friends of Borth-y Gest (Tom Brooks) [3036]	POLICY ARNA1	Object	We wish the policy to make it clear that ARNA1 relies strictly on the CURRENT definition of the "West of Wales Shoreline Management Plan 2".  We note that in the WWSMP that Borth y Gest is clearly marked as "hold the Line" and benefits from this policy until at least 2055. We consider that the policy should make clear that after the local plan is adopted, any subsequent change to the WWSMP2 will not change the areas to which ARNA1 would apply.
940	Cyng/Counc Alwyn Gruffydd [381]	POLICY ARNA1	Object	The plan needs to be more coordinated. It is not rational to note an area as one which is at risk of flooding on one hand, while on the other noting the numbers of houses which the

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				area requires. That the West Wales Shoreline Management Plan (SMP) 2 needs to be considered and the plan should be aligned with it.
1070	Welsh Government (Mr Mark Newey) [1561]	POLICY ARNA1	Object	The Policy is supported in principle but would benefit from minor editing to ensure clarity. Clause 1 - suggest insertion of "predicted to be" immediately before "threatened", to ensure link to SMP. Clause 2 - clarify whether proposals must meet both sub-clauses (i) and (ii), or either one of the sub-clauses. Clause 6 - it is not clear why the requirement for NRW consent is specific and unique to this clause. Clause 8 - The text within brackets is unclear, as it appears to suggest that after the first policy epoch (2025) certain developments would be acceptable. It is not clear how that fits with a plan with an end date of 2026.
1138	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY ARNA1	Object	Rather than seek for specific amendments to policy ARNA1 which seek to exclude application of this policy from the marine located associated development, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from these policies.

# 7.3 – Economy and Regeneration

## **Major Infrastructure Projects**

#### **Context and Introduction**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
866	National Grid (Mrs Rebecca Evans) [2961]	7.3.1	Object	National Grid would expect to see reference to National Policy Statements (NPSs) within the JLDP's policy background on large infrastructure projects, for example paragraphs 7.3.1 to 7.3.17 could contain further information on the role of the NPSs, which is mentioned briefly at the start of Strategic Policy PS8.
1139 1156 1140 1141 1142 1143	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.1 7.3.2 7.3.3 7.3.4 7.3.5 7.3.6	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1144 1145 1146 1147 1148 1149 1150 1151 1152 1153		7.3.7 7.3.9 7.3.10 7.3.11 7.3.12 7.3.13 7.3.14 7.3.15 7.3.16 7.3.17		others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
867	National Grid (Mrs Rebecca Evans) [2961]	7.3.13	Object	National Grid has some concerns about the description of planning contributions, particularly community benefits, within paragraphs 7.3.13 to 7.3.17. National Grid will always seek to reduce the negative impacts of its proposed developments through carefully considered design iterations informed by assessments and consultation; through the identification of comprehensive mitigation measures. It is recognised that in some cases planning conditions may not adequately secure the inherent design and further mitigation measures and these may therefore need to be secured in planning terms through a Section 106 agreement. In the case of Nationally Significant Infrastructure Projects, EN-1 sets out when planning obligations may be used for energy infrastructure, and indicates that weight can only be given to obligations which meet all of the tests for their use. Amend criterion 4 of PS8 and delete criterion 5.

# PS8 – Proposals for Large Infrastructure Projects

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
466	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS8	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres and Hafan-y-Mor may be able to assist in meeting the housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be accommodated via various means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.
843	Nathaniel Lichfield & Partners (Mr Arwel Evans) [2767]	STRATEGIC POLICY PS8	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres and Hafan-y-Mor may be able to assist in meeting the housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be accommodated via various

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.
1154	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS8	Object	Horizon's representations seek to clarify that it is PS9 which applies to the Wylfa Newydd Project rather than a mix of PS8 and PS9. Having excluded PS 8 from the policy framework for the Wylfa Newydd Project Horizon does not therefore comment specifically on PS8 except to note that any changes made to PS9 (in accordance with its representations below) may be usefully carried through to PS8 for consistency.

#### **PS9 – Wylfa Newydd Related Development**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
464	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS9	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres and Hafan-y-Mor may be able to assist in meeting the housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be accommodated via various means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.
844	Nathaniel Lichfield & Partners (Mr Arwel Evans) [2767]	STRATEGIC POLICY PS9	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres and Hafan-y-Mor may be able to assist in meeting the housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be accommodated via various means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.
862	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS9	Object	A 'plan B' is needed in case this project, which is years away from final approval, does not go ahead.
882	Mr John Tripp [252]	STRATEGIC POLICY PS9	Object	The contractors of Wylfa B to employ 85% + - local people. Need to secure a big training school.
930	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	STRATEGIC POLICY PS9	Support	Some of our assets may require investment to facilitate growth related to Wylfa Newydd.  Our AMP investment is regulated both in terms of the amount of funding and the timing o the planned work therefore there may be instances where developers needs do not coincide with the timing of our investment. Where infrastructure improvements would be required prior to planned investment we would look at other mechanisms to fill this funding gap such as developers' contributions through planning obligations. Once the locations of associated

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				development are confirmed we will assess the impact upon our assets and advise accordingly.
1155	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS9	Object	In order to ensure that the unique opportunity to transform the economy and communities of Anglesey is recognised by the Plan specific Wylfa Newydd Project policies should be developed that along with PS9 should shape the approach to the Wylfa Newydd Project and in particular the proposals for associated development. Recognising the unique status of the development whilst the other policies in the Plan should be properly considered the PS9 and proposed Wylfa Newydd specific policies should take precedence where there is an inconsistency or conflict between them and the other policies. Specific amendments are suggested to criteria 3, 7, 9, 11 & 12.

# **PS10 – Providing Opportunity for a Flourishing Economy**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
455	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS10	Object	Specific reference should be added to PS10 to reflect the important role that tourism plays in ensuring a flourishing economy. A 4th bullet point should be added to read:  "4. Supporting new and existing tourism development/redevelopment where appropriate, in order to take full advantage of the economic benefit that tourism development brings to the Local Plan area."
803	Barton Willmore (Mr Mark Roberts) [1645]	STRATEGIC POLICY PS10	Object	Based on the allocated 807 ha of employment land and premises within the Deposit LDP there is over 66 years of employment land and premises supply within the Plan area. Whilst it is recognised that Wylfa Newydd could have a significant economic impact on the need and demand for employment land and premises, there will not be the need for this level of employment land or premises.  The Plan therefore significantly over allocates and protects employment land premises and particularly sites which are unlikely to deliver employment due to the sites not meeting the needs of industry, or subject to significant site constraints.  The Policy therefore does not comply with Test of Soundness C2 as it does not comply with Planning Policy Wales & CE2 as it is not realistic having regard to other alternatives or based upon credible evidence.  The policy should be amended to only include sufficient available, suitable and deliverable employment land needed for the duration of the Plan Period.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
825	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGIC POLICY PS10	Object	PS10 Comment on conclusion of needs for employment land from alternative studies.
828	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	STRATEGIC POLICY PS10	Object	We are glad that Llanystumdwy Agri Park has been included as Secondary Site but we consider that other sites should be considered, e.g. the old Laundry at Afonwen.  We consider that more should be done to retain industrial sites when they change hands and that the Plan does not do enough to support small businesses, particularly family businesses in the countryside.
902	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS10	Object	PS10 is inconsistent with the remainder of the LDP as it doesn't recognise the significant economic benefit that tourism brings to the local area. Paragraph 4.3 states that tourists/visitors make an important contribution to the local economy. Bourne Leisure therefore maintains that PS10 should reflect the significant contribution that tourism makes to the local economy.  Recognition of the important role of tourism within Strategic Policy PS10 is also necessary to ensure consistency with PPW (para 11.1.1). It would also accord with the Gwynedd Destination Management Plan (2013 - 2020).  Bourne Leisure therefore comments that specific reference should be added to PS10 to reflect the important role that tourism plays in ensuring a flourishing economy.
1046	Welsh Government (Mr Mark Newey) [1561]	STRATEGIC POLICY PS10	Object	Welsh Government supports economic growth however, it is crucial that this economic growth meet the authorities' objectives. The authorities should clarify that oversupplying the market to this extent (approximately by 300ha) will not have negative implications for land values; nor hinder development from coming forward or jeopardise growth aspirations.
1166	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS10	Object	Concerns about the lack of flexibility in relation to non-employment related development (B1, B2 and B8) on sites covered by the policy, particularly in relation to a change of use for legacy (e.g. to tourism) as this would reduce the overall availability of B1, B2 and B8 sites and therefore run counter to the intention for these to be employment sites. However, rather than seek for specific amendments to policies PS10, CYF1 and CYF2 however, Horizon proposes to rely on the Wylfa Newydd specific policies which will be the relevant policies against which to determine its associated development applications.
1301	Cyngor Dinas Bangor	STRATEGIC	Object	The City Council is of the opinion that existing sites in Bangor accommodating such

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	(Mr Gwyn Hughes) [1523]	POLICY PS10		enterprises should be protected from redevelopment. Examples would be the small units at the rear of the upper part of the High Street and Station Road and the site between Sackville Road and Mentec.  More sites should be allocated for such uses in the JLDP so that small business start-ups
1412	NFU Cymru (Dafydd Jarrett) [3285]	STRATEGIC POLICY PS10	Object	would be encouraged in the interest of nurturing enterprise in the local economy.  NFU Wales would like to make the following general comments about the Development Management Policies included in the draft Plan. We are eager to ensure opportunities that would not prevent the following development:  Expansion of existing businesses; Re-use of existing rural buildings appropriate for employment opportunities; Provide work units by adapting traditional rural buildings; Diversification of the agricultural economy; Support social and economic regeneration in rural areas; Adapting and changing the use of redundant rural buildings outside development boundaries should be permitted to create employment use; Viable scheme that can adapt to current faming and business demands so that they can prosper in the countryside.
1418	NFU Cymru (Dafydd Jarrett) [3285]	STRATEGIC POLICY PS10	Object	NFU Wales would like to make the following general comments about the Development Management Policies included in the draft Plan. We are eager to seek opportunities that would not prevent the following development:  • Initiatives required to satisfy the needs of contemporary farming and forestry. Also infrastructure including green energy, tourism and other initiatives that would support a sustainable rural economy.
1424	NFU Cymru (Dafydd Jarrett) [3285]	STRATEGIC POLICY PS10	Object	NFU Wales would like to make the following general comments about the Development Management Policies included in the draft Plan. The Plan should:  • Make the most effective use of land in the area and there needs to be a specific reference in the Plan to the value of agriculture and local produce.  • Promote not farming growth and diversification  • Acknowledge the value of small holdings in Anglesey and Gwynedd as a way that

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				young farmers can start and develop businesses.  • Acknowledge the value of agriculture and local food businesses to the local economy, employment opportunities and the Welsh language.
1608	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	STRATEGIC POLICY PS10	Support	Water mains required for any potential development can be acquired through the water requisition provisions of the Water Industry Act 1991 (am amended). Any proposed site which requires the provision of non-potable water for process use will need further examination to understand how this requirement could be delivered. Sewerage required for any potential development site can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).
1609	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	STRATEGIC POLICY PS10	Support	* Should potential end users of these sites result in the discharge of new or amended trade effluent then the written consent of DCWW is required.
1610	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	STRATEGIC POLICY PS10	Support	* The proposed employment allocations represent a substantial area of land for development for which the potential demands are unknown at present. It is essential that we understand these demands in order to allow us to assess the impact on our assets. It may be necessary for water and sewerage modelling assessments to be undertaken to establish how we would provide the water supply and where the proposed development could connect to the public sewerage system. At this moment in time, our response is on the basis of domestic demands based on the area and location of the proposed allocations.

# CYF1 – Safeguarding and Allocating Land and Units for Employment Use

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
801	Menter laith Bangor (Mrs Branwen Thomas) [2762]	POLICY CYF1	Support	Fair employment is crucial to provide a basis for a stable community in Bangor - ensuring the success of the Welsh language. Welcoming the scheme that proposes to safeguard land and units on the existing employment sites in Bangor. There is a great need for a further development.  Recommend establishing a committee to examine the 21st century needs of the city of Bangor as one entity. There is a need to secure dwellings, infrastructure, employment and education opportunities, a shopping centre, a clean environment and appropriate amenities for the residents and all users of the city.  There is a need for the Committee to include representation of friends of the city.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
826	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY CYF1	Object	CYF1 Comment on difference between safeguarded amount and target take-up rate of employment land.
883	Mr John Tripp [252]	POLICY CYF1	Object	Aim for Holyhead to develop industry:  * explore Wylfa B  * main port from Ireland
1013	Cyngor Cymuned Pentir (Mr Dilwyn Pritchard) [1536]	POLICY CYF1	Object	The Council is concerned that an industrial site is proposed in the Penrhosgarnedd area. The Council doesn't object to creating more employment sites, but it was considered that this would add to the area's hustle and bustle. It must be remembered that a lot of money has been spent during the last decade to develop Bryn Cegin Estate and the reasonable steps would be to get this site operational. It could also house the new science park being proposed for Gaerwen, Anglesey.
1047	Welsh Government (Mr Mark Newey) [1561]	POLICY CYF1	Object	Further clarification is required on how the distribution of employment sites relate to the provision for housing. The housing commitments/ allocations are based on a hierarchy of settlements and it would be helpful if the employment sites could be presented in a similar manner. It would also be helpful if further information could be provided on how the authorities have considered the inter-linkages between the three main strategic employment sites along the A55 corridor, and that these are not in competition with each other and therefore creating problems of deliverability.
1048	Welsh Government (Mr Mark Newey) [1561]	POLICY CYF1	Object	Further clarification is required to:  1. explain why the plan makes provision for approximately 478ha compared to a need for approximately 180ha of employment land as set out in the employment land review.  2. demonstrate that the implications of this over allocation for housing provision and the deliverability of the sites has been considered.  3. demonstrate that the employment assessment is in accordance with Welsh Government's "TAN 23: Economic Development (2014)"  4. explain what the implications would be on types of jobs (skills and salaries) and homes if land take were to exceed the 180ha over the plan period and whether the assessment work, especially the WLIA has taken account of this over-allocation.
1167	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY CYF1	Object	Concerns about the lack of flexibility in relation to non-employment related development (B1, B2 and B8) on sites covered by the policy, particularly in relation to a change of use for legacy (e.g. to tourism) as this would reduce the overall availability of B1, B2 and B8 sites and therefore run counter to the intention for these to be employment sites. However, rather than seek for specific amendments to policies PS10, CYF1 and CYF2 however, Horizon

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				proposes to rely on the Wylfa Newydd specific policies which will be the relevant policies against which to determine its associated development applications.
1401	Cyng/Counc Alwyn Gruffydd [381]	POLICY CYF1	Object	The provision of industrial land needs to be extended beyond the main centres to expand growth across the County. This would be a method of safeguarding communities by taking advantage of economic vitality.

## CYF2 – Ancillary Uses on Employment Sites

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1168	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY CYF2	Object	Concerns about the lack of flexibility in relation to non-employment related development (B1, B2 and B8) on sites covered by the policy, particularly in relation to a change of use for legacy (e.g. to tourism) as this would reduce the overall availability of B1, B2 and B8 sites and therefore run counter to the intention for these to be employment sites. However, rather than seek for specific amendments to policies PS10, CYF1 and CYF2 however, Horizon proposes to rely on the Wylfa Newydd specific policies which will be the relevant policies against which to determine its associated development applications.

#### CYF3 - No comments

#### **CYF4 – Alternative Uses of Employment Sites**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
798	First Investments Ltd [3091]	POLICY CYF4	Object	FIL object to the current wording of this policy which, instead of promoting investment and improvements to existing employment space, will result in, at best, retaining the status quo at Peblig Mill Industrial Estate owned which is characterised by old and, in some cases, defunct employment floorspace with a high proportion of vacancies. The policy should instead promote investment in existing employment stock and where necessary, promote alternative uses on the Peblig site that are capable of delivering investment and improvements to the overall quality of employment floorspace.  FIL request that the policy be amended to include the following changes;  Create a further independent criterion which deals with poor quality employment sites, e.g.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Peblig Industrial Estate, to permit alternative uses and the loss of some employment land where such development could deliver improvements to the remaining floorspace.
827	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY CYF4	Object	CYF4 More flexibility sought in alternate use of sites.
1169	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY CYF4	Object	It is not clear how the criteria of this policy would need to be met in order for land to be released and what evidence will be acceptable to the Councils in proving conformity to the policy. However, rather than seek for specific amendments to policy CYF4, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from these policies

#### CYF5 – Reuse and Conversion of Rural Buildings, Use of Residential Properties or New Build Units for Business / Industrial Use

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
332	Mr Geoff Wood [2916]	Policy CYF5	Object	Generally supportive of the policy. However, there are many existing vernacular rural buildings that are not structurally sound but are still largely intact which have heritage value. Under the policy currently drafted these would be lost. These types of building could however be repaired and viable uses reintroduced which would help to preserve the local character and/or the Welsh culture. The policy should reflect this.
884	Mr John Tripp [252]	Policy CYF5	Object	Farming and fishing - important sector, particularly mussels being exported to Holland.

## CYF6 – Regeneration Sites

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
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Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
804	Barton Willmore (Mr Mark Roberts) [1645]	POLICY CYF6	Object	This policy seeks to promote economic growth and contribute to social and environmental objectives by facilitating urban renewal schemes, including for mixed use purposes for housing, employment, retail and leisure etc.  However, the policy does not specify any specific regeneration sites despite the references within the Wales Spatial Plan to the mixed-use development of the former Dynamex Friction site in Caernarfon.  Clearly, the former Dynamex Friction Site, given our representations to other policies of the Plan, falls within this policy approach.  The former Dynamex Friction site of 20 ha should be identified within this policy for regeneration and redevelopment for mixed use purposes including, employment, housing, and other appropriate uses.  This is necessary as the other policies of the Plan will not enable the redevelopment and regeneration of this vacant, contaminated and previously developed site, which is sustainably located in close proximity to Caernarfon.

#### 7.3 Omissions

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1162	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7:3 Omissions	Object	Horizon has proposed WNP1 which is specifically related to the siting of new non-residential associated development related to the Wylfa Newydd Project.
1163	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7:3 Omissions	Object	Horizon has proposed WNP2 which is specifically related to the large scale temporary worker accommodation associated development related to the Wylfa Newydd Project.
1164	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7:3 Omissions	Object	Horizon has proposed WNP3 which is specifically related to the temporary construction workforce for the Wylfa Newydd Project.
1165	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7:3 Omissions	Object	Horizon has proposed WNP4 which is specifically related to early works related to the Wylfa Newydd Project.

# **Employment Sites**

## 1) Bangor

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
786	Parc Bryn Cegin Cinema campaign (mrs Tammy Hales) [2745]	POLICY CYF1, C1 - Parc Bryn Cegin, Bangor	Object	We request the planning status of Parc Bryn Cegin, is changed from business planning employment, to include  leisure planning permission status A1, A3, C1, D2 & D8. Thus creating;  1) Local employment,  2) Much needed leisure facilities,  3) Creating a tourist attraction and  4) Boosting the local economy.  If the planning status of Parc Bryn Cegin remain unchanged, it is likely the site will remain dormant.  To change the planning status of Parc Bryn Cegin from business planning employment, to include or ideally change to leisure planning permission status A1, A3, C1, D2 & D8.
1611	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C1 - Parc Bryn Cegin, Bangor	Object	The employment area represents a substantial area of land for development for which the potential demands are unknown at present. Once demands are known an assessment can be made of the extent of any off-site water mains that may be required. This site is crossed by a 250mm water main along its northern boundary which will restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.
1612	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C1 - Parc Bryn Cegin, Bangor	Object	A sewage pumping station (SPS) is located within the site and an assessment may be required to establish whether the flows from this site can be accommodated or whether future improvements to the SPS will be required to allow development to proceed. Should the existing sewerage infrastructure not be sufficient to accommodate the proposed level of growth the provision of sewerage infrastructure can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).
1613	Dwr Cymru Welsh	POLICY	Object	The site would eventually drain to the Bangor Beach Road SPS and an assessment of this

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Water (Mr Dewi Griffiths ) [2680]	CYF1, C1 - Parc Bryn Cegin, Bangor		SPS may be required to establish whether flows from this site can be accommodated or whether future improvements would be required to the SPS to allow development to proceed. The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.
1614	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C2 – Llandygai Industrial estate, Bangor	Object	The local water network located within the existing industrial estate is sufficient to provide the domestic water demands required to serve this development area.  The local sewerage network located within the existing industrial estate can accept the domestic foul flows arising from this development area.  The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.
1615	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C3 - Parc Britannia, Bangor	Object	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows arising from this development area.  The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.
1616	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C4 - Parc Menai, Bangor	Object	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows arising from this development area  The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions
1441	Cyfoeth Naturiol Cymru / Natural	POLICY CYF1, C16 -	Object	This site is located directly adjacent to Traeth Lafan Special Protection Area, Y Fenai a Bae Conwy Special Area of Conservation, Traeth Lafan Site of Special Scientific Interest and

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Resource Wales (Ymgynhoriadau Cynllunio) [1521]	Bae Hirael, Bangor		Traeth Lafan Local Nature Reserve. Any proposal to develop the site will need to demonstrate that it will not have an adverse effect on the site features. The requirements of the 2010 Habitat Regulations apply. Drainage proposals for development will need to take into account the proximity of protected sites and in particular any nearby watercourses that are hydrologically connected to protected sites, ensuring that discharges do not affect water quality within protected sites.
				Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
1634	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C16 - Bae Hirael, Bangor	Object	Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991.
				The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

## 2) Amlwch

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
824	Cyngor Tref Amlwch (Mrs M Hughes) [1266]	POLICY CYF1, C28 - Former Shell Site, Amlwch	Object	Council feel there should be an option on the C28 area - industry and dwellings - starter homes
1649	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C28 - Former Shell Site, Amlwch	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area. The public sewerage network can accept the domestic foul flows arising from this development area. Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset. Amlwch Wastewater Treatment Works can accommodate the foul flows from the domestic demands arising from this development area

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1650	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C29 - Llwyn Onn Industrial Estate, Amlwch	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area. Potential developers need to be aware that this site is crossed by water main and protection measures in the form of easement widths or a diversion of the pipe would be required.
1651	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C29 - Llwyn Onn Industrial Estate, Amlwch	Support	The public sewerage network can accept the domestic foul flows arising from this development area. Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.  Amlwch Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

#### 3) Holyhead

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1283	Mon a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	POLICY CYF1, C11 - Parc Cybi, Holyhead	Object	The Cae Glas area is shown as an employment site but is wildlife rich and prone to flooding. It should be protected from economic/industrial development.
1626	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C11 - Parc Cybi, Holyhead	Support	This site is crossed by 90mm and 125mm water mains along the western and eastern boundaries which may restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
1627	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C11 - Parc Cybi, Holyhead	Support	Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

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1686	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C11 - Parc Cybi, Holyhead	Support	The site is crossed by pumped rising sewer main which may restrict development density for the site. Ty Mawr Sewage Pumping Station (SPS) is located within the site and an assessment of the SPS will be required to establish whether all the flows from the proposed allocation can be accommodated or whether future improvements to the SPS will be required to allow all the proposed development to proceed. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
1628	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C12 – Penrhos Industrial Estate, Caergybi	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows arising from this development area.  The site is located adjacent to Holyhead WwTW which may give rise to odour, fly and noise nuisance for any development in close proximity to the works. As such your authority may wish to consider providing a buffer zone between the works and any proposed development site.  Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.
1652	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C30 – Anglesey Aluminium, Caergybi	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  * The public sewerage network can accept the domestic foul flows arising from this development area. Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
1653	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C30 – Anglesey Aluminium, Caergybi	Support	The site is located adjacent to Holyhead WwTW which may give rise to odour, fly and noise nuisance for any development in close proximity to the works. As such your authority may wish to consider providing a buffer zone between the works and any proposed development site.  * Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from

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				the domestic demands arising from this development area.
1654	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C31 - Former Eaton Electrical, Caergybi	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area.
1655	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C31 - Former Eaton Electrical, Caergybi	Support	Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.
1689	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C31 - Former Eaton Electrical, Caergybi	Object	Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset. There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.
1656	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C32 - Kingsland, Caergybi	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area. Potential developers need to be aware that this site is crossed by water main and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the density achievable on site
1657	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C32 - Kingsland, Caergybi	Support	Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.
1690	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C32 - Safle Kingsland, Caergybi	Support	Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset. There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.
				I am objecting to a Conservation Area containing numerous residential amenities being shown as being land marked for business use.
829	Robert Llewelyn Jones [3058]	POLICY CYF1, C35 – Holyhead Port, Caergybi	Object	The area is covered by the SPG for Holyhead Beach and by a lease held by the County Council.
				To show clearly on the constraints map that this area is not for the extension of the Port facilities and has to be retained as a public open space.
1286	Mon a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	POLICY CYF1, C35 – Holyhead Port, Caergybi	Object	In the area shown as an employment site, Newry Beach should be protected from economic/ industrial development.
				The inclusion of the port area as an Energy Island Programme "reserve site" within Policy CYF1 is unnecessarily restrictive and detrimental to the port's long term development and viability.
1382	Conygar StenalineLtd [3304]	POLICY CYF1, C35 – Holyhead Port, Caergybi	Object	This policy is fundamentally flawed and conceived without an understanding of the challenges and opportunities the port faces over the plan period.
				Policy CYF1 conflicts with the objectives of Policy CYF7 and the role which the port can play in the regeneration of the town and tourism promotion.

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				There is sufficient alternative land in Holyhead allocated for employment uses (200+ ha) to support the exclusion of the port from this policy.  Proposed amendment to Policy CYF1 to delete any reference to Holyhead Port as a
				"reserve site" (C35wg) for the purposes of the Anglesey Energy Island Programme.
1662	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C35 – Holyhead Port, Caergybi	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area. The sewerage network in the area is extensive and where sewers cross potential development sites this will restrict development density for the site, and protection measures in respect of these assets will be required. A number of Sewage Pumping Stations (SPS) are located in the area and may need assessment to ascertain their capacity dependant on the location and type of development proposed.

## 4) Llangefni

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
1629	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C13 - Bryn Cefni Industrial Estate, Llangefni	Support	The sewerage network in the area is extensive and where sewers cross potential development sites this will restrict development density for the site, and protection measures in respect of these assets will be required. Llangefni Main Sewage Pumping Station is located in the area and may need assessment to ascertain its capacity dependant on the location and type of development proposed.
				Llangefni Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.
	Welsh Government (Mr	POLICY CYF1, C14 – Land to		The potential loss of BMV land could result in the permanent loss of approximately 40 hectares. The majority of the land is included in allocations TRA1, C14 and C15 and the
1053	Mark Newey) [1561]	the north of Lledwigan Farm	Object	plan has limited evidence to demonstrate that paragraph 4.10 has been considered at all in allocating these sites for development.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1402	Bob Parry & Co Ltd [3342]	POLICY CYF1, C14 – Land to the north of Lledwigan Farm	Object	Include the Dafarn Newydd site as an alternative to the Lledwigan Farm site. The proposed alternative site for employment in Llangefni is a sustainable development proposal. The suggested site at Dafarn Newydd is an appropriate addition to the settlement, and would perform better against the LDP's criteria than site C14 at Lledwigan Farm.
1630	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C14 – Land to the north of Lledwigan Farm	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area
1631	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C14 – Land to the north of Lledwigan Farm	Support	Llangefni Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.
1687	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C14 – Land to the north of Lledwigan Farm	Support	The site is crossed by a pumped rising foul main which may restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset. The site is adjacent to a pumped rising main and Llangefni Main SPS. An assessment of the SPS may be required to establish whether the flows can be accommodated or whether improvements to the SPS' will be required to allow development to proceed. Off-site sewers would be required to connect to the nearest point of adequacy on the sewerage network.
1054	Welsh Government (Mr Mark Newey) [1561]	POLICY CYF1, C15 – Creamery Land, Llangefni	Object	The potential loss of BMV land could result in the permanent loss of approximately 40 hectares. The majority of the land is included in allocations TRA1, C14 and C15 and the plan has limited evidence to demonstrate that paragraph 4.10 has been considered at all in allocating these sites for development.
1632	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C15 – Creamery Land, Llangefni	Support	This site is crossed by a 400mm water main which will restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset
1633	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C15 – Creamery Land, Llangefni	Support	Llangefni Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.
1688	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C15 – Creamery Land, Llangefni	Support	The site is adjacent to a pumped rising main and Llangefni Main SPS. Off-site sewers would be required to connect to the nearest point of adequacy on the sewerage network. The provision of sewerage for the potential development site can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended). An assessment

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				of the SPS may be required to establish whether the flows can be accommodated or whether improvements to the SPS' will be required to allow development to proceed. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
999	Watkin Jones (Mr Stuart Hardy) [3159]	Map 4 - Llangefni	Object	Land at Tan y Capel, Llangefni. The above information, which is supplemented by a comprehensive sustainability appraisal of the site, indicates that the site is suitable for employment uses and should be included for allocation within the JLDP. The site is accessible, available, deliverable and developable and can help Anglesey/Gwynedd meet its employment land requirements throughout the plan period. The site is therefore considered to be appropriate to be brought forward due to its highly sustainable location in Llangefni, which is recognised within the JLDP as a priority area for development.
1002	Owen Devenport Ltd (Mr Berwyn Owen) [2755]	Map 4 - Llangefni	Object	Land at Dafarn Newydd, Llangefni. The proposed alternative site for employment in Llangefni is a sustainable development proposal. The suggested site at Dafarn Newydd is an appropriate addition to the settlement, and would perform better against the LDP's criteria than C14 at Lledwigan Farm.

# 5) Blaenau Ffestiniog

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1636	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C18 - Safle Tanygrisiau, Blaenau Ffestiniog	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows arising from this development area.  Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area
433	Ffestiniog Town Council (Mrs Ann Coxon) [2940]	CYF1, C18  TANYGRISIAU  BLAENAU	Support	On the proposals map, Ffestiniog Town Council supports the designation on land surrounding Rehau as a zone to be developed for industry. Space is needed to enable business to expand.

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## 6) Caernarfon

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1617	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C5 – Cibyn Industrial Estate, Caernarfon	Object	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows arising from this development area. Part of the site is crossed by a surface water sewer which may restrict development density for the site. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
1618	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C5 – Cibyn Industrial Estate, Caernarfon	Object	The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.
799	First Investments Ltd [3091]	POLICY CYF1, C19 - Peblig, Caernarfon	Object	FIL object to the current wording of this policy which, instead of promoting investment and improvements to existing employment space, will result in, at best, retaining the status quo at Peblig Mill Industrial Estate owned which is characterised by old and, in some cases, defunct employment floorspace with a high proportion of vacancies. The policy should instead promote investment in existing employment stock and where necessary, promote alternative uses on the Peblig site that are capable of delivering investment and improvements to the overall quality of employment floorspace.  FIL request that the policy be amended to include the following changes;  Recognise the viability and vacancy issues in relation to this site and support the redevelopment of existing sites in need of investment;
				□ Promote alternative uses where they are able to support such redevelopment/investment

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				at the Peblig site potentially through a link to an amended draft Policy CYF4;  □ Remove hierarchal approach to employment allocations, particularly given the differences in definitions between the Evidence Base and Draft Policy
1637	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C19 - Peblig, Caernarfon	Object	Our local water network should be sufficient to provide the domestic water demands required to serve this development area. This site is crossed by a water main which will restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
1638	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C19 - Peblig, Caernarfon	Object	Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.  The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

## 7) Porthmadog

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1086	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY CYF1, C8 – Porthmadog Business Park	Object	The whole site is within flood zone C1. However, flood modelling work suggests that the actual risk to the site is low due to the flood defences within the area. NRW would expect any planning application to be supported by a Flood Consequence Assessment to ensure that development is adequately protected.
1623	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C8 – Porthmadog Business Park	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Porthmadog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area

#### 8) Pwllheli

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
105	Cyfoeth Naturiol Cymru (Mr Gareth Thomas) [2757]	POLICY CYF1, C6 - Adwy'r Hafan, Pwllheli	Object	Site C6 is within flood zone C1 of Welsh Government's TAN15: Development Advice Maps. The flood risk has not been assessed. Locating a new employment unit within the site would contradict national policy TAN15. The SFCA, section 9.3 states that none of the allocations fall within zones C1 or C2. There may be risk of flooding due to a breach of the defences (sand dunes) along the eastern boundary, and the potential for flood water to enter the site from over the quay wall to the west of the site.
1082	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY CYF1, C6 - Adwy'r Hafan, Pwllheli	Object	The land is located within flood zone C1 of the Welsh Government's TAN15: Development Advice Maps. Developing this land for employment use would contradict national policy guidance contained within TAN15. NRW considers that the flood risk associated with this site has not been adequately assessed.  NRW recommends that either a stage 2 or stage 3 SFCA is prepared and forwarded to NRW for further assessment to demonstrate that developing this site for employment use would comply with the requirements of TAN15 or that development brought forward under this allocation includes no erection of new employment units within the site.
1619	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C6 - Adwy'r Hafan, Pwllheli	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  A sewage pumping station (SPS) is located within the site and an assessment may be required to establish whether the flows from this site can be accommodated or whether future improvements to the SPS will be required to allow development to proceed. Should the existing sewerage infrastructure not be sufficient to accommodate the proposed level of growth the provision of sewerage infrastructure can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).
1620	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C6 - Adwy'r Hafan, Pwllheli	Support	Pwllheli Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area

# 13) Gaerwen

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1658	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C33 – Gaerwen Industrial Estate, Gaerwen	Object	Our local water network is sufficient to provide the domestic water demands required to serve this development area. Potential developers need to be aware that this site is crossed by water main and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the density achievable on site.
1659	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C33 – Gaerwen Industrial Estate, Gaerwen	Object	The proposed employment allocations in Gaerwen represent a substantial area of land for development for which the potential demands are unknown at present. It is essential that we understand these demands in order to allow us to assess the capacity of Gaerwen Wastewater Treatment Works (WwTW) to accept the domestic demands from this development area.
1691	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C33 – Gaerwen Industrial Estate, Gaerwen	Object	There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990. A hydraulic modelling assessment is required to determine an adequate point of connection to the public sewer and potential developers would be expected to fund investigations during pre-planning stages. Off-site sewers would be required to connect to the sewerage network from parts of the site, which can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).
1663	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C33 – Gaerwen Industrial Estate, Gaerwen	Object	Off-site water mains may be required to serve the site. These can be provided through a water requisition scheme under Sections 41 - 44 of the Water Industry Act 1991.
1664	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C36 – Extension to Gaerwen Industrial Estate, Gaerwen	Object	The proposed employment allocations in Gaerwen represent a substantial area of land for development for which the potential demands are unknown at present. It is essential that we understand these demands in order to allow us to assess the capacity of Gaerwen Wastewater Treatment Works (WwTW) to accept the domestic demands from this development area.
1692	Dwr Cymru Welsh Water (Mr Dewi Griffiths )	POLICY CYF1, C36 – Extension to Gaerwen	Object	There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[2680]	Industrial Estate, Gaerwen		progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990. A hydraulic modelling assessment is required to determine an adequate point of connection to the public sewer and potential developers would be expected to fund investigations during pre-planning stages. Off-site sewers would be required to connect to the sewerage network from parts of the site, which can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).
1180	Llanfihangel Esc Community Council (Alun Foulkes) [3121]	POLICY CYF1, C38 - Parc Gwyddoniaeth Menai	Object	Creating a new employment site (C38) is totally inappropriate for the village for a number of reasons such as the effect of traffic, surface water, sewerage and the visual impact. There is already a large employment allocation already in Gaerwen which is over half the size of the village with a number of empty/vacant land and units.
1287	Mon and Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	POLICY CYF1, C38 - Parc Gwyddoniaeth Menai	Object	This should be continued as a farm, ideally as an educational/demonstration resource.
1666	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C38 - Parc Gwyddoniaeth Menai	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
1667	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C38 - Parc Gwyddoniaeth Menai	Object	The proposed employment allocations in Gaerwen represent a substantial area of land for development for which the potential demands are unknown at present. It is essential that we understand these demands in order to allow us to assess the capacity of Gaerwen Wastewater Treatment Works (WwTW) to accept the domestic demands from this development area.
1694	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C38 - Parc Gwyddoniaeth Menai	Object	There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990. A hydraulic modelling assessment is required to determine an adequate point of connection to the public sewer

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				and potential developers would be expected to fund investigations during pre-planning stages. Off-site sewers would be required to connect to the sewerage network from parts of the site, which can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).

## 21) Bethesda

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
1635	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C17 - Felin Fawr, Bethesda	Support	* Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
				Tregarth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area

## 23) Llanberis

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
1641	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C21 - Glynrhonwy, Llanberis	Support	The public sewerage network can accept the domestic foul flows foul flows arising from this development area. Glan Rhonwy Sewage Pumping Station is located in the area and may need assessment to ascertain its capacity dependant on the type of development proposed.
				Llanberis Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

# 25) Nefyn

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1645	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C25 – Nefyn Industrial Estate, Nefyn	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area. There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.Morfa Nefyn Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

#### 26) Penrhyndeudraeth

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1621	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C7 - Penrhyndeudrae th, Business Park	Support	The local water network located within the existing industrial estate is sufficient to provide the domestic water demands required to serve this development area.  A sewage pumping station (SPS) is located within the site and an assessment may be required to establish whether the flows from this site can be accommodated or whether future improvements to the SPS will be required to allow development to proceed. Should the existing sewerage infrastructure not be sufficient to accommodate the proposed level of growth the provision of sewerage infrastructure can be acquired through the sewer requisition provisions of the Water Industry Act 1991
1622	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C7 - Penrhyndeudrae th, Business Park	Support	Penrhyndeudraeth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area
1284	Duncan Teed [289]	POLICY CYF1, C22 – Former Ysbyty Bron y Garth, Penrhyndeudrae th	Object	Reclassify former hospital from B1 use to C3 & C2 use     Correct land area mistake in CYF1 and other tables (1.6ha not 16ha)

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				- Building is former NHS hospital (C2 and Grade 2 listed)
				- Deposit Plan changed use class to B1
				- Have examined B1 usage and buildings not physically suitable for conversion to B1, Grade 2 listed
				- No demand for additional business units (vacant units in Penrhyndeudraeth and Blaenau Ffestiniog). Change to B1 not commercially viable
				- Building needs development to stop deterioration - builder advises to convert to apartments.
				- Good access onto A496 and tarmac car parks
				- East side (0.8ha) undeveloped and could develop into housing or employment (hotel, garden centre etc)
1442	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY CYF1, C22 – Former Ysbyty Bron y Garth, Penrhyndeudrae th	Object	Part of this site is located within Ysbyty Bron y Garth Site of Special Scientific Interest. We would recommend that a design guide is prepared to guide development at the former Bron y Garth Hospital site.
				Our local water network is sufficient to provide the domestic water demands required to serve this development area.
1642	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C22 – Former Ysbyty Bron y Garth, Penrhyndeudrae th	Support	* The public sewerage network can accept the domestic foul flows foul flows arising from this development area. The foul flows would lead to Penrhyndeudraeth Pumping Station (SPS) and an assessment of this SPS may be needed to establish whether the flows can be accommodated or whether improvements to the SPS will be required to allow development to proceed.
				* Penrhyndeudraeth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area
1083	Cyfoeth Naturiol	POLICY CYF1,	Object	The land is located within flood zone C2 of the Welsh Government's TAN15: Development

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	C39 – Griffin Industrial Estate, Penrhyneudraet h		Advice Maps. Developing this land for employment use would contradict national policy guidance contained within TAN15.  NRW recommends that either a stage 2 or stage 3 SFCA is prepared and forwarded to NRW for further assessment to demonstrate that developing this site for employment use would comply with the requirements of TAN15 or that development brought forward under this allocation includes no erection of new employment units within the site.
106	Cyfoeth Naturiol Cymru (Mr Gareth Thomas) [2757]	POLICY CYF1, C39 – Griffin Industrial Estate, Penrhyneudraet h	Object	C39: Griffin Industrial Estate, Penrhyndeudraeth - is within flood zone C2 of Welsh Government's TAN15: Development Advice Maps. Locating a new employment unit within the site would contradict national policy TAN15. The SFCA, section 9.3 states that none of the allocations fall within zones C1 or C2. The flood risk has not been assessed.  Either a stage 2/stage 3 SFCA submitted that demonstrates the site would comply with TAN15 requirement, or that no NEW employment units to be provided within this site.
1681	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C39 – Griffin Industrial Estate, Penrhyneudraet h	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows foul flows arising from this development area. The foul flows would lead to Penrhyndeudraeth Pumping Station (SPS) and an assessment of this SPS may be needed to establish whether the flows can be accommodated or whether improvements to the SPS will be required to allow development to proceed.  Penrhyndeudraeth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.
1621	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C7 - Penrhyndeudrae th, Business Park	Support	The local water network located within the existing industrial estate is sufficient to provide the domestic water demands required to serve this development area.  A sewage pumping station (SPS) is located within the site and an assessment may be required to establish whether the flows from this site can be accommodated or whether future improvements to the SPS will be required to allow development to proceed. Should the existing sewerage infrastructure not be sufficient to accommodate the proposed level of growth the provision of sewerage infrastructure can be acquired through the sewer

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				requisition provisions of the Water Industry Act 1991
1622	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C7 - Penrhyndeudrae th, Business Park	Support	Penrhyndeudraeth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area

# 27) Penygroes

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1643	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C23 – Penygroes Industrial Estate, Penygroes, Gwynedd	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area. Potential developers need to be aware that the site is crossed by a number of sewers. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.  Penygroes is served by Llanllyfni Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the domestic demands arising from this development area.
926	Mr Robert Jones [3107]	Map 27 - Penygroes, Gwynedd	Object	We wish to object to the development boundary proposed for the Local Service Centre of Penygroes. We wish to propose a site adjacent to the Industrial Estate to be included within the development boundary of Penygroes. The inclusion of the site within the development boundary of Penygroes would therefore be considered as a logical extension to the development boundary to provide a mix of commercial, community and leisure development which could include community services including a petrol filling station and retail shop, together with leisure services including a tourist information centre and tourist related workshops.  We wish to see the development boundary for Penygroes reviewed and altered to include the site adjacent to the Industrial Estate within the development boundary which would form a logical extension to the development boundary to provide a mix of commercial, community and leisure development which could include community services including a petrol filling station and retail shop, together with leisure services including a tourist information centre and tourist related workshops.

# 28) Tywyn

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Our local water network is sufficient to provide the domestic water demands required to serve this development area.
1624	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C9 – Pendre Industrial Estate, Tywyn	Support	The public sewerage network can accept the domestic foul flows arising from this development area.
				Tywyn Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

#### 39) Y Ffôr

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1385	Council for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY CYF1, C10 - Adjacent to the petrol station, Y Ffor	Object	We support C10 around the garage (Tir Dolwar). While we note that the 2.8ha C27 employment site (Industrial estate, partly includedin the GUDP, is still vacant, we suggest that C10 should therefore be allocated flexibly, whether to housing or employment, depending on emerging priorities and development proposals.
1625	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C10 - Adjacent to the petrol station, Y Ffor	Object	* Our local water network is sufficient to provide the domestic water demands required to serve this development area.  * The public sewerage network can accept the domestic foul flows arising from this development area.  * The proposed growth being promoted for this settlement would require improvements at Y Ffor Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions
1647	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C27 - Y Ffôr Industrial Estate, Y Ffôr	Object	* Our local water network is sufficient to provide the domestic water demands required to serve this development area.  * The public sewerage network can accept the foul flows arising from this development area. Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset
1648	Dwr Cymru	POLICY CYF1,	Object	* The proposed growth being promoted for this settlement would require improvements at Y

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Welsh Water (Mr	C27 - Y Ffôr		Ffor Wastewater Treatment Works (WwTW) which would need to be funded through our
	Dewi Griffiths)	Industrial		Asset Management Plan or potentially earlier through developer contributions.
	[2680]	Estate, Y Ffôr		

## 53) Llangristiolus

0	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1014	Watkin Jones (Mr Stuart Hardy) [3159]	Map 53 - Llangristiolus	Object	Land adj Llanfawr Newydd. The above information, which is supplemented by a comprehensive sustainability appraisal of the site, indicates that the site holds strategic importance in Anglesey and should be allocated for a range of uses (light industrial/commercial/mixed uses/leisure) that can be brought forward during the plan period. In summary, the site has excellent access; could be an enabling factor in the initiating of development on the adjacent service station site, would increase the critical mass or gravity pull with investors and would provide synergy between mixed used development and employments.

## II) Ferrodo

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Only partially identifies the extent of the former Friction Dynamex site as being allocated and subject to a policy support for development. This allocation is therefore artificially and inaccurately defined, and does not reflect the extent of the previously developed land on the site.
1404	Barton Willmore (Mr Mark Roberts) [1645]	POLICY CYF1, C20 - Former Friction Dynamex Site, Caernarfon	Object	The plan needs to provide a more flexible, responsive and pragmatic approach to redeveloping this site. The site whilst potentially appropriate for B2 development is unlikely ever to secure such development as a single occupant. Perpetuating this policy approach will unlikely result in the development of the site for B2 uses.
				The site should be deleted from Policies PS10 and CYF1 and identified as a specific regeneration / mixed use development site.
				Reference should be made to the presumption in favour of sustainable development.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1639	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	CYF1, C20 - Former Friction Dynamex Site, Caernarfon	Object	Our local water network should be sufficient to provide the domestic water demands required to serve this development area.  An extensive distance of off-site sewers would be required to connect to the public sewerage system. Where no public sewerage facilities are available then the provisions of Circular 10/99 Planning Requirement in respect of the 'Use of Non-Mains Sewerage Incorporating Septic Tanks in New Development' apply and consultation with the Environment Agency is required. The provision of sewerage for the potential development site can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).
1640	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	CYF1, C20 - Former Friction Dynamex Site, Caernarfon	Object	If a connection was made to the public sewerage network, the proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.
1660	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C34 - Land near Mona Airfield, Mona	Support	* Our local water network is sufficient to provide the domestic water demands required to serve this development area.  * The public sewerage network can accept the foul flows arising from this development area. Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
1644	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C24 - Agricultural Park, Llanystumdwy	Support	* Our local water network is sufficient to provide the domestic water demands required to serve this development area.  * There are no public sewers in close proximity to this site, as such the provisions of 'Circular 10/99 Planning Requirement in respect of the Use of Non-Mains Sewerage in New Development' apply and potential developers may wish to consider installing a private package plant treatment works. Consultation with Natural Resources Wales would be required on this matter
1661	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C34 - Land near Mona Airfield, Mona	Support	* Mona Sewage Pumping Station (SPS) is located near the site and an assessment of the SPS may be required to establish whether all the flows from the proposed allocation can be accommodated or whether future improvements to the SPS will be required to allow all the proposed development to proceed.  * Llangefni Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area
1665	Dwr Cymru	POLICY CYF1,	Object	* Off-site water mains may be required to serve the site. These can be provided through a

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Welsh Water (Mr Dewi Griffiths ) [2680]	C37 - Former site of Shell, Rhosgoch		water requisition scheme under Sections 41 - 44 of the Water Industry Act 1991.
1693	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C37 - Former site of Shell, Rhosgoch	Object	* There are no public sewers in close proximity to this site. The nearest public sewers are approximately 2km away in Amlwch to the north, or approximately 2km to the south east in Rhosybol. Off-site sewers would be required however a development of this size would result in expensive off-site solutions for sewerage provision. Where no public sewerage facilities are available in close proximity, as with this site, then the provisions of 'Circular 10/99 Planning Requirement in respect of the Use of Non-Mains Sewerage in New Development' apply and potential developers may wish to consider installing a private package plant treatment works. Consultation with Natural Resources Wales would be required on this matter.
1275	Karen Taylor [3291]	POLICY CYF1, C26 - Wynnstay Farmer's site, Rhosfawr	Object	Pease remove the area highlighted in green from employment allocation C26:  - Unacceptable extension of existing site into agricultural land  - Existing developed site appears under utilised  - It would have unacceptable impact on residential amenity. Existing site already causes noise problems from operations and movement of large vehicles.  - Inadequate highway network to accommodate additional use. Dangerous access onto the B4354  - Unsustainable location - not served by regular bus service, only accessible by car  - Unacceptable visual intrusion into the open countryside  - Fields are potentially of high biodiversity value - unimproved grassland.
1378	Mr & Mrs R Moore [3302]	POLICY CYF1, C26 - Wynnstay Farmer's site, Rhosfawr	Object	Unacceptable impact on residential amenity. Existing site already causes noise & disturbance problems. A bigger site would exacerbate this & bring the use much closer to the back of our house which would be dominating and oppressive.  There are still plenty of empty spaces on other industrial estates in the locality that are more suitable and could meet a need if there is one.  Inadequate highway network to accommodate more use. Junction to the B4354 is dangerous.  Unsuitable location - not served by a regular bus service. Only accessible by car. Too far to walk and no pavement from Y Ffôr.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				The designation completely removed as an employment site or the area in the attached plan highlighted in green removed from the designation so it contained to the existing developed site.
1646	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C26 - Wynnstay Farmer's site, Rhosfawr	Support	* Our local water network is sufficient to provide the domestic water demands required to serve this development area.  * There are no public sewers in close proximity to this site, as such the provisions of 'Circular 10/99 Planning Requirement in respect of the Use of Non-Mains Sewerage in New Development' apply and potential developers may wish to consider installing a private package plant treatment works. Consultation with Natural Resources Wales would be required on this matter.

## The Visitor Economy

#### **Context and Introduction**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
294	Cyfeillion Llyn (Mrs Sian Parri) [2871]	7.3.46	Object	It should be clearly noted that there is conflict between promoting tourism in the traditional way and safeguarding the Welsh language.
191	Kingsbridge Caravan Park (Mr Andrew Bate) [2778]	7.3.47	Support	Tourism associated with caravan and camping parks brings a significant amount of money into the Anglesey and Gwynedd areas. This is "new" money which is injected into the local economy. I would like to see a more positive approach, by the authorities, toward the development and quality of existing caravan and camping parks. Park owners need to gain some reward from their investments.

## PS11 – The Visitor Economy

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
ID.				

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
184	Ellesmere Sand & Gravel Company Limited [2686]	STRATEGIC POLICY PS11	Object	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.  Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate.
185	Lafarge Tarmac Trading Limited [2735]	STRATEGIC POLICY PS11	Object	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the above mentioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.  Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate
340	Mr Geoff Wood [2916]	STRATEGIC POLICY PS11	Object	Self-catering accommodation, such as cottages and apartments, has a significant contribution towards the visitor economy and these types of facility are not considered within Strategic Policy PS11 at the moment.
456 & 761	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS11	Object	Bourne Leisure endorses PS11 in principle as it supports the development of a year-round local tourism industry. However, Bourne Leisure considers that point 3 should be redrafted to read:  "Managing, and enhancing the provision of high quality un-serviced tourism accommodation in the form of camping, alternative luxury camping, static or touring caravan or chalet parks."
741	Tom Brooks [3034]	STRATEGIC POLICY PS11	Object	Policy PS11 as drafted threatens further development of tourist accommodation through the conversion of existing property to tourist accommodation. Borth-y-Gest already has more than 60% holiday homes or tourist units.  Outside peak summer period Borth-y-Gest is not quite a ghost village but further holiday homes would rapidly make it so.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				PS11 should be amended to read "preventing development that would have an unacceptable adverse effect on tourist attractions, including those developments that could have an adverse impact on pretty villages, including the presence of the Welsh culture and developments that could damage all year round life in tourist appealing villages."
777	Cyngor Cymuned Botwnnog (Mrs Gwenda Roberts) [1541]	STRATEGIC POLICY PS11	Object	The Plan refers to the visitor economy - if this is to be effective, roads, footpaths and cycle paths should be developed and improved. There is an immediate need for the Council to consider these for the benefit of the local residents as well as tourists. If the facilities leading to this special Peninsula were improved, it might be possible to establish an industry here and therefore reduce the numbers who are unemployed.
785	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGIC POLICY PS11	Object	We acknowledge the important role of caravans in tourism in the JLDP area. Our principal concern is landscape damage from overdevelopment, increasing permanence of tourers and lack of adequate screening of sites. We argue that the moratorium on new static sites should be extended to touring sites, at least in designated areas, while small additions to existing sites should continue to be permitted in exchange for genuine improvements in visual impact. Tackling these issues would contribute to achieving higher quality rather than a larger quantity of caravan tourism accommodation at the expense of the landscape, implicitly in line with point 3 of PS11. Such improvements should be sought more vigorously and implemented more effectively for all exposed sites, including single statics on individual properties (see submission CPRW23). These concerns should be reflected in strategic policies for tourism.
791	Caravan Club [3039]	STRATEGIC POLICY PS11	Object	In summary the policies relating to tourist accommodation are considered to be overly restrictive and lacking in clarity on the type of development which is acceptable on existing touring caravan sites. The policy should be amended to ensure that the plan does not affect the ability of local tourist businesses from adapting to the changing needs of the visitor economy and does not impact on the future economic viability of these businesses which support local economies, employments and communities.
860	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS11	Support	Policy PS11 is supported.
1414	NFU Cymru (Dafydd	STRATEGIC POLICY PS11	Object	NFU Wales would like to make the following general comments about the Development Management Policies included in the draft Plan. Opportunities that would not prevent the

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Jarrett) [3285]			following development:  * Initiatives linked to appropriate tourism;  * Leisure, but not if they aren't appropriate to a countryside location and another land use
				in the locality, including agriculture.

#### TWR1 - Visitor Attractions and Facilities

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
186	Ellesmere Sand & Gravel Company Limited [2686]	POLICY TWR1	Object	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.  Remove reference to development boundary. Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate
187	Lafarge Tarmac Trading Limited [2735]	POLICY TWR1	Object	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.  Remove reference to development boundary. Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate
396	Welsh Highland Railway (Mr Graham Farr)	POLICY TWR1	Support	Support.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[254]			
457 & 744	Bourne Leisure Ltd [2768]	POLICY TWR1	Object	Policy TWR1 should therefore be redrafted to allow for the sensitive development / reconfiguration / expansion of tourist accommodation that fall outside the settlement boundary, providing that commensurate mitigation measures (for example, the inclusion of a buffer zone and appropriate landscaping) can be implemented to mitigate both direct and indirect impacts.
1170	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY TWR1	Object	Clarification is required as to what is meant by "development boundary".  Rather than seek for specific amendments to policy TWR1, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from this policy.

## TWR2 - Holiday Accommodation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
190	Ellesmere Sand & Gravel Company Limited [2686]	POLICY TWR2	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. This policy is supported as long as mineral extraction sites are considered previously developed sites at point 4.
193	Lafarge Tarmac Trading Limited [2735]	POLICY TWR2	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. This policy is supported as long as mineral extraction sites are considered previously developed sites at point 4.
342	Mr Geoff Wood [2916]	POLICY TWR2	Object	It is difficult to quantify what an over-concentration of holiday accommodation is, which leads to a lack of certainty for applicants.  Delete or amend part 8 "That the development does not lead to an over-concentration of such accommodation within the area."

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
344	Mr Geoff Wood [2916]	POLICY TWR2	Object	Support the principle of the policy and in particular part 4, however it does not take account of preserving vernacular buildings with heritage value. In some circumstances, these can be viably developed to help preserve local character and / or Welsh heritage.  Amend part 4 to read "In the case of new build accommodation, that the development is located within a development boundary, or makes use of a suitable previously developed site or involves the reuse of a heritage asset that helps preserve local character and/or the Welsh culture"
742	Tom Brooks [3034]	POLICY TWR2	Object	Much of the loss of housing units for local families has been created by the conversion of existing buildings into "permanently serviced and self-serviced holiday accommodation". This is a deeply damaging trend for villages such as Borth-y-Gest. TWR2 needs amending to protect against any further loss of family accommodation. It currently carries a presumption of granting permission and the caveats are non-specific and undefinable.  TWR2 should be amended to delete point 2 (conversion of exiting buildings). A new policy should be added to permit conversion of existing buildings only in the higher ranked settlements in the settlement strategy.
1072	Welsh Government (Mr Mark Newey) [1561]	POLICY TWR2	Object	The policy would be strengthened with an explanation of where the Councils consider 'over-concentration' (Clause 8) of certain accommodation might be a risk.
1171	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.55	Object	This comment applies to paragraphs 7.3.55 - 7.3.80 - Horizon is concerned to ensure that these paragraphs do not impact the construction worker accommodation. Rather than seek for specific amendments to these paragraphs, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated development applications.

TWR3 – Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
96	BH&HPA [2733]	POLICY TWR3	Object	Policy TWR3 should adjudge planning applications for holiday caravan parks located within the AONB and SLA's against a common set of criteria which should apply to all parks. If development proposals can demonstrate significant environmental improvements to the design, layout and appearance of a holiday park then they should be encouraged regardless of where they are located. If the overall impact of an existing site is reduced and/or significant economic benefits would result, then there is no sound reason to preclude against additional pitches. The incentive needs to be there to assist in funding these often expensive development projects.  Amended Policy  1. Delete Point 3 2. Amend Point 4 to allow proposals to improve existing static caravan and chalet sites by allowing minor extension to site area, and/or The relocation of units and/or, A minor increase in the number of units on site subject to detailed criteria. See full submission for detailed text.
197	Kingsbridge Caravan Park (Mr Andrew Bate) [2778]	POLICY TWR3	Object	Whilst I would agree with the proposal to refuse the development of NEW parks within the AONB, consideration should be given to the proposal to restrict the increase in numbers of units in AONB areas. This may lead to increased demand for second homes from visitors. The effects of this are evident in Rhosneigr and Trearddur Bay.  I would like to see a degree of flexibility with each case considered on its own merits and perhaps negotiation between planners and park owners.
222	Ellesmere Sand & Gravel Company Limited [2686]	POLICY TWR3	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.
223	Lafarge Tarmac Trading Limited [2735]	POLICY TWR3	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
308	Point Lynas Caravan Park/Pant y Saer Caravan Park (Mr Peter Hoyland) [2886]	POLICY TWR3	Object	Item 3 iii of Policy TW3 is insufficiently flexible to achieve the policy aims. A small increase in the number of static caravan or chalet pitches on the park will be considered if it can be shown that they are a requirement for an improvement scheme to be viable.
458	Bourne Leisure Ltd [2768]	POLICY TWR3	Support	Aspects of TWR3 are supported as it facilitates proposals to improve existing static and chalet sites provided they conform to a number of criteria.
483	Cadnant Planning (Mr Rhys Davies) [1366]	POLICY TWR3	Object	The policy effectively places an embargo on additional static caravans within the AONB and SLA's. This provides no incentive to owners and operators to bring forward improvements to their sites. The effective embargo on additional caravans is contrary to National Planning Policy which places an increased emphasis on the economic benefits of tourism.
515	Bodafon Caravan Park (Mr Robert Roberts) [180]	POLICY TWR3	Object	Number 1 This paragraph relates to proposals for the development of new Parks and refers to "permanent alternative camping accommodation". There is no definition of "permanent alternative camping accommodation" in the explanation 7.3.60 to 7.3.66 that follows Policy statement TWR3 Does it mean touring caravans, tents or camping, trailer tents, motor homes, pods, yurts, wigwams, and tepees. These have been grouped together and covered in Policy statement TWR5. Policy TWR5 does not differentiate between AONB areas and non-AONB areas. There is therefore possible ambiguity between Policy TWR3 and TWR5.  Policy TWR3 needs to provide a definition of "permanent alternative camping accommodation" in a Citation similar to 1 and 2 on page 114. Changes cannot be suggested without being provided with a definition.
516 & 1052	Bodafon Caravan Park (Mr Robert Roberts) [180]	POLICY TWR3	Object	POLICY TWR3 3 does not allow any increase in numbers of units. Therefore, no incentive to Park Owners to make improvements  Changes to Plan Add: 3(iii) a very minor increase in the number of units on site. Explanations:

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Minor is defined in para 7.3.66 as "should be no greater than a 10% increase on the number at the time of the original application".  The definition of minor should be amended to "should be no greater than a 15% increase etc.  Definition of "very minor"  And "Very minor in relation to site area is not defined except in relation to an increase in the number of units and should be no greater than a 10% increase on the number at the time of the original application"
517	John Parry [2128]	POLICY TWR3	Object	Explanation 7.3.60 Considers there is a need for further provision of new static caravans and chalets to meet consumer demands. Explanation 7.3.63 considers there is scope for minor static and chalet park extensions as part of a general improvement plan in coastal areas" Explanation 7.3.64 and 7.3.65 Considers that there is no incentive to improve sites if numbers cannot be increased Explanation 7.3.46 Considers that a policy of no extension to existing static parks in AONB contradicts the with the Council's identification of tourism as a key priority
519 & 520	Lambe Planning & Design Ltd (Mr Jeremy Lambe) [1674]	POLICY TWR3	Object	The proposed Policy TWR3 does not allow any minor increase in units within the AONB when considering proposals to improve sites.  Minor increase in the number of units is required to assist with funding of upgrading.  Upgrading requires significant investment. Policy D17 of Gwynedd UDP gives an incentive to upgrade.  Minor increase in number of pitches should be allowed to assist in funding relocation of sites within Coastal Change Management Zone.  Delete the reference in point 3 of Policy TWR3 sub paragraph iii -which states "the improvements does not increase the number of static caravan or chalet units on the site and utilise the same wording as Point 4 of Policy TWR3 sub paragraph iii which states "a minor increase in the number of units on site will be permitted providing all of the following criteria can be met".
739	Haulfryn Group Ltd [2986]	POLICY TWR3	Object	Where holiday Caravan Parks are located within the Coastal Change Management a minor increase in the number of pitches, as part of a proposal that relocates pitches away from the shoreline affected by rising sea levels.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Holiday Park operations contribute significantly to sustainable local communities by providing a market for local goods and services, as well as providing much needed local employment.  A minor increase is necessary to fund the proposal to relocate pitches away from more
				vulnerable areas to avoid potential loss and fund the investment required to relocate pitches.
	Haulfryn			Policy TWR3 does not allow for a minor increase in pitches within the AONB compared to the existing UDP Policy (D17). To assist with funding the upgrading a site, a minor increase in the number of static holiday caravans/chalets is required.
740	Group Ltd [2986]	POLICY TWR3	Object	Delete reference in point 3 of TWR3 which states "the improvements does not increase the number of static or chalet units in the site" and utilize the same wording as point 4 of TWR3 which states "a minor increase in the number of units on site will be permitted providing all of the following criteria can be met".
757	Bourne Leisure Ltd [2768]	POLICY TWR3	Object	Bourne Leisure does not object to point 3 and 4 in policy TWR3 as currently drafted would allow the sensitive redevelopment of caravan parks which is key to maintaining the tourism offer in the plan area which in turn has a significant positive impact on the local economy.
757				However, Bourne Leisure considers that it would be beneficial for the wording of this policy to be amended to embody a more positive and flexible approach whereby the constant state of change in tourism facilities is acknowledged, with redevelopment and site rationalisation to meet the needs of the dynamic tourism market.
782	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd	POLICY TWR3	Support	This policy is supported as it is proposed to refuse new sites and extensions within the AONB and the SLA.
	Gruffydd Williams) [3090]			We believe that priority should be given to monitoring compliance with planning permissions, planning conditions, landscaping conditions and conditions on occupancy.
787	Campaign for the Protection of Rural Wales (Mr Noel Davey)	POLICY TWR3	Object	We agree with the continued moratorium on new static sites in AONBs and SLAs, but we are concerned about its relaxation elsewhere. We suggest it is maintained in otherwise unprotected buffer areas of the AONBs and within 2 km of the coast where the greatest pressures have been felt, and that only very small new sites are permitted elsewhere. We agree with continuation of a guideline limit of 10% on expansions of existing sites in all areas in return for genuine environmental improvements, but look for strengthening of

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[1169]			effective landscaping plans, colouring standards, monitoring and enforcement.
790	Caravan Club [3039]	POLICY TWR3	Object	In summary Policy TWR3 is overly restrictive and lack clarity on the type of development which is acceptable on existing touring caravan sites. The policy should be amended to ensure that the plan does not affect the ability of local tourist businesses from adapting to the changing needs of the visitor economy and does not impact on the future economic viability of these businesses which support local economies, employments and communities.
792	Caravan Club [3039]	POLICY TWR3	Object	In summary the policies relating to tourist accommodating are considered to be overly restrictive and lacking in clarity on the type of development which is acceptable on existing touring caravan sites.
485 & 486	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.63	Object	Para 7.3.63 is inconsistent with Policy TWR3 which allows extensions to sites regardless of the conclusion of the sensitivity and capacity study.  Additionally, it is clear that the study has not considered the capacity of the area in such detail as to be able to conclude that there is "no capacity" for further static caravan/chalet park development or extensions"
518	Haulfryn Group Ltd [2986]	7.3.64	Object	Paragraph 7.3.64 refers to no increase in caravan or chalet numbers. A minor increase in the number of units should be permitted when the proposal is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site. Without a minor increase to the number of pitches, it may not be possible to fund the significant investment required to pay for upgrading proposals.  Where Holiday Parks are located within the Coastal Change Management Zone (within the AONB),and relocation of pitches are required due to a "rollback" position from the shoreline, a minor increase in the number of pitches should be allowed to assist with funding the relocation of holiday pitches and the significant investment required.  POLICY TWR3 paragraph 7.3.64 change to allow a minor increase in units provided it can be demonstrated that significant site improvements and reduced landscape impact would result
758	Bourne Leisure Ltd [2768]	7.3.65	Support	Bourne Leisure endorses supporting 7.3.65 as it explains that the purpose of the policy is to promote improvements and upgrade the standard of tourist accommodation alongside reducing the impacts of these sites on the landscape. This approach is in accordance with Bourne Leisure's development aspirations which normally seek to reconfigure/redevelop sites in order to improve the overall quality of the holiday facilities alongside reducing impact on the local environment. This can be done by utilising sensitive landscaping techniques. Endorse the policy aspiration of reducing impact on the landscape as the high quality natural environment is a key attraction for tourists.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
198	Kingsbridge Caravan Park (Mr Andrew Bate) [2778]	7.3.66	Object	Setting a limit of 10% increase in numbers is placing the smaller parks at a disadvantage compared to parks with large numbers of units and gives the large parks an unfair commercial advantage.  I would like to see the limit of 10% increase in numbers deleted and have each case considered on its merits. Small parks have particular problems with limited turnover and need an increase in numbers to recover costs associated with raising quality standards and environmental improvements.
759	Bourne Leisure Ltd [2768]	7.3.66	Support	Bourne Leisure endorses supporting para 7.3.66 as we consider it sensible to not define the size of the area that can be sought as part of redevelopment proposals. This is because some proposals may require a large site area however this area may be used as a buffer for landscaping purposes which has a positive impact on the local environment. Bourne Leisure also considers that it is sensible to assess each site on its own merit within this general guide. This is because of the wide variety of tourist accommodation in Gwynedd.

### TWR4 – Holiday Occupancy

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
97	BH&HPA [2733]	POLICY TWR4	Support	We would wish to register our support to Policy TWR4 as it complies with the aims and objectives of Planning Policy Wales (PPW) and is in accordance with similar development plan policies in neighbouring Local Planning Authorities which support and encourage extended holiday occupancy periods. The Policy is sound and fulfils all of the required tests of soundness.
224	Ellesmere Sand & Gravel Company Limited [2686]	POLICY TWR4	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.
225	Lafarge Tarmac Trading Limited [2735]	POLICY TWR4	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
613 & 614	Menter Môn (Helen Thomas) [1615] Hunaniaith (Debbie A. Williams Jones) [3037]	POLICY TWR4	Object	There is no economic benefit from extending the holiday season to 12 months which would contribute towards securing sustainable communities.  Neither can the Welsh language cope with the negative impact of extending the holiday season. This could mean a substantial increase in the population of some communities, and the little advantage to be had from that is outweighed by the negative effects of such permissions - such as the effect on the linguistic nature of communities, and the pressure on public services.  There is a need to reconsider the policy of opening for 12 months.
783	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	POLICY TWR4	Object	There was concern about allowing static caravan/chalet sites to remain open for 12 months a year. There are insufficient resources to be able to monitor the situation and people could live permanently in the units - without paying tax.
789	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY TWR4	Object	The goal of extending the tourist season is sensible, but presents problems in the caravan sector. Allowing all-year use of static caravans as opposed to the previously established 10.5 month limit makes no difference to their visual impact and responds to established precedents. However, we share concerns that there is insufficient capacity to monitor and enforce genuine holiday use and prevent permanent residential occupancy, contrary to intended policy. The potential economic benefits of 6 weeks of extra use in the low season seem unlikely to justify these risks. On the other hand, policies to limit holiday use of statics to 28 days at a time or 3 months/year also seem to us arbitrary, impractical and unenforceable.  Scrap limitations on caravan holiday use as these are unworkable
795	Caravan Club [3039]	POLICY TWR4	Object	In summary the policies relating to tourist accommodating are considered to be overly restrictive and lacking in clarity on the type of development which is acceptable on existing touring caravan sites. The policy should be amended to ensure that the plan does not affect the ability of local tourist businesses from adapting to the changing needs of the visitor economy and does not impact on the future economic viability of these businesses which support local economies, employments and communities.
1400	Cyng/Counc Alwyn	POLICY TWR4	Object	The view is that extending the holiday season does not contribute substantially to the promotion of sustainable communities, and that the few benefits are outweighed by the

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Gruffydd [381]			negative effects of such permissions, such as the impact on the linguistic nature of communities and the pressure on public services.
				Need to further consider the policy of opening for 12 months.

## TWR5 – Touring Caravan, Camping and Temporary Alternative Camping Accommodation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
98	BH&HPA [2733]	POLICY TWR5	Object	Whilst draft Policy TWR5 is generally accepted, the imposition of criterion 7 fails to meet the tests of soundness set down for the LDP. There is no planning reason for the imposition of limitation on length of stay and this would unreasonably dictate how a park is operated. The requirement could not be enforced or monitored and is not in accordance with other local planning policies in adjoining areas. It is therefore requested that this element of Policy TWR5 is removed. In order for Policy TWR5 to be 'sound' the accompanying text should be amended. See full submission for detailed changes suggested.
199	Kingsbridge Caravan Park (Mr Andrew Bate) [2778]	POLICY TWR5	Object	Touring caravan parks should be allowed to store caravans for customers provided they are located in unobtrusive areas.  This is a key element of the touring park activity and does not appear to be addressed in the policy document. Storage of units has the advantage of reducing disruption on main roads and country lanes and above all reduces vehicle emissions by way of improved fuel economy of the vehicle which would otherwise be towing a caravan.
226	Ellesmere Sand & Gravel Company Limited [2686]	POLICY TWR5	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.
227	Lafarge Tarmac Trading Limited [2735]	POLICY TWR5	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
467	Cadnant Planning (Mr Rhys Davies) [1366]	POLICY TWR5	Object	We object to criteria 3 and 7 of policy TWR 5. Criterion 3 could be amended to read: capable of being removed off the site if the use has been discontinued.
784	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	POLICY TWR5	Object	Members had noticed an increase in applications and considerable pressure from this type of development in the Llŷn area. We questioned whether there was a basis for the policy and had an analysis been made of the increase in units/the effect of new developments? We believe the policy should be more restrictive within and near the designated area.  We believe that priority should be given to monitoring compliance with planning
788	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY TWR5	Object	permissions, planning conditions, landscaping conditions and conditions on occupancy.  We oppose the continuation of a permissive policy for touring caravan sites in the most sensitive landscape areas, in the absence of evidence regarding its impact. We believe the visual impact of tourers, including cumulative impact, is being underestimated and it risks being as great as that acknowledged for static sites in the past. As a precautionary policy we seek a moratorium on new touring sites within AONBs, SLAs and within 2 km of the coast and some limitation on the size of extensions of existing sites. We support policies for extension of existing sites, provided limits are specified, in exchange for genuine environmental improvements, and provided these are actually monitored and enforced.
468	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.74	Object	The words "When not in use and during the winter months all units should be removed from the site" should be deleted as touring caravans, tents and camping pods can stay on the land "when not in use". Additionally, many touring caravan and alternative camping sites are open during some but not all of the "winter months". The text which requires their removal during winter months therefore has the effect of shortening the holiday season contrary to national policy.
472	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.75	Object	The extent and acceptability of areas of hard standings can be adequately assessed under Policy TWR 5 without the need to have an effective "embargo" as set out within para. 7.3.75
470	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.76	Object	The wording of paragraph 7.3.76 contradicts the aims of Policy TWR5 which is to facilitate the establishment of high quality touring and camping sites in appropriate locations and recognises the contribution made by high quality touring and camping sites to the range of holiday accommodation available for visitors.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				The restriction to limit any temporary structures to basic facilities with no drainage or water will inhibit the provision of high quality touring and camping sites. The highest quality alternative camping sites do need to provide water and drainage connections that are now sought by high spend tourists.
473	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.77	Object	Touring or alternative camping units do not become classified as "static" caravans of permanent accommodation simply by virtue of the fact that they may be connected to mains water or drainage. Delete 7.3.77
475	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.78	Object	This policy is unduly restrictive and contrary to National Planning Policy as the economic benefits of many forms of alternative camping sites can be extended to periods covering almost 12 months.

## **Town Centres and Retail Developments**

#### **Context and Introduction**

Rep Id	Name	Section	Туре	Summary of Representation / Change(s) to Plan
112	CPERA (Cynghorydd Elin Walker Jones) [2760]	7.3.81	Support	The High Street and the city centre should also be used for dwellings, as well as commerce and entertainment. It should not be permitted to build higher than three storeys when building flats or student halls on sites that are off-campus.

### **PS12 – Town Centre and Retail Developments**

Rep Id	Name	Section	Туре	Summary of Representation / Change(s) to Plan
432	Cyngor Tref Ffestiniog (Mrs Ann Coxon)	STRATEGIC POLICY PS12	Support	The map of the Local Plan denotes the town centre incorrectly in our opinion. There are many shops between the station and the Commercial Pub. Many of the town's most important shops are on this part of the High Street, including McColls, one newsagents and one Chinese food shop. These buildings should be kept as shops, in our opinion.

Rep Id	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[2940]			Menter laith Bangor supports Polisi PS12 Town Centres and Retail and point 1- Encourage a varied mixture of suitable uses (as defined in PPW and TAN 4) in high quality
606	Menter laith Bangor (Mrs Branwen Thomas) [2762]	STRATEGIC POLICY PS12	Support	environments which attract a broad range of people at different times of day, that are safe and accessible for everyone. There are too many takeaways in the centre of Bangor and a lack of hotels and restaurants. The Initiative would welcome native Welsh businesses that would use the Welsh language and provide a Welsh ethos to the main streets, which are lacking any trace of Welsh language and culture at present.
840	Cyngor Dinas Bangor (Mr Gwyn Hughes) [1523]	STRATEGIC POLICY PS12	Object	Policies safeguarding the vitality and viability of Bangor as a Sub-regional Retail Centre and protecting Bangor by restricting expansion of out-of-town and out-of-centre retailing and leisure developments are welcomed. However, potential redevelopment areas should be identified within or close to the town centre so that a retailing or leisure opportunity is not missed. Several sites appear ripe for redevelopment:  - South eastern side of High Street between Plas Llwyd and Dean Street Junction, including Plas Llwyd car park.  - North western side of the High Street including the Rose and Crown and the White Lion.  - University buildings and car park off James Street, rear of Dean Street, including former Octogon building.
861	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS12	Support	Policy PS12 is supported (noting sub-regional importance of Bangor)
1067	Welsh Government (Mr Mark Newey) [1561]	STRATEGIC POLICY PS12	Object	Different hierarchy to retail and housing - what is the rationale for the difference?
1068	Welsh Government (Mr Mark Newey) [1561]	STRATEGIC POLICY PS12	Object	It is unclear where the provision of retail space will be located.

Rep Id	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1172	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS12	Object	Horizon is concerned that Criterion 6 "restricting the expansion of out-of-centre retailing and leisure development" could unduly restrict the development of leisure facilities at temporary worker accommodation sites.  Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.

### **MAN1 – Proposed Town Centre Developments**

Rep Id	Name	Section	Туре	Summary of Representation / Change(s) to Plan
112	CPERA (Cynghory dd Elin Walker Jones) [2760]	7.3.81	Support	The High Street and the city centre should also be used for dwellings, as well as commerce and entertainment. It should not be permitted to build higher than three storeys when building flats or student halls on sites that are off-campus.
432	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	STRATEGIC POLICY PS12	Support	The map of the Local Plan denotes the town centre incorrectly in our opinion. There are many shops between the station and the Commercial Pub. Many of the town's most important shops are on this part of the High Street, including McColls, one newsagents and one Chinese food shop. These buildings should be kept as shops, in our opinion.
606	Menter laith Bangor (Mrs Branwen Thomas) [2762]	STRATEGIC POLICY PS12	Support	Menter laith Bangor supports Polisi PS12 Town Centres and Retail and point 1- Encourage a varied mixture of suitable uses (as defined in PPW and TAN 4) in high quality environments which attract a broad range of people at different times of day, that are safe and accessible for everyone. There are too many takeaways in the centre of Bangor and a lack of hotels and restaurants. The Initiative would welcome native Welsh businesses that would use the Welsh language and provide a Welsh ethos to the main streets, which are lacking any trace of Welsh language and culture at present.
840	Cyngor Dinas Bangor (Mr Gwyn Hughes)	STRATEGIC POLICY PS12	Object	Policies safeguarding the vitality and viability of Bangor as a Sub-regional Retail Centre and protecting Bangor by restricting expansion of out-of-town and out-of-centre retailing and leisure developments are welcomed. However, potential redevelopment areas should be identified within or close to the town centre so that a retailing or leisure opportunity is not missed. Several sites appear ripe for redevelopment:

Rep Id	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[1523]			<ul> <li>South eastern side of High Street between Plas Llwyd and Dean Street Junction, including Plas Llwyd car park.</li> <li>North western side of the High Street including the Rose and Crown and the White Lion.</li> <li>University buildings and car park off James Street, rear of Dean Street, including former Octogon building.</li> </ul>
861	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS12	Support	Policy PS12 is supported (noting sub-regional importance of Bangor)
1067	Welsh Governme nt (Mr Mark Newey) [1561]	STRATEGIC POLICY PS12	Object	Different hierarchy to retail and housing - what is the rationale for the difference?
1068	Welsh Governme nt (Mr Mark Newey) [1561]	STRATEGIC POLICY PS12	Object	It is unclear where the provision of retail space will be located.
1172	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS12	Object	Horizon is concerned that Criterion 6 "restricting the expansion of out-of-centre retailing and leisure development" could unduly restrict the development of leisure facilities at temporary worker accommodation sites.  Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.
536	Cyngor Tref Biwmares (Prof TW Ashenden) [1267]	POLICY MAN1	Object	The Town Centre of Beaumaris marked on this map does not properly represent the actual town centre area of the town. It is important that these areas are correctly identified in the Deposit Plan so that Beaumaris's position as a local service centre and important tourism destination can be secured by the plan.

### MAN2 - Primary Retail Areas (Retail Core)

Rep ID	Person/ Organisation	Section	Support / Object	Summary of Representation / Change(s) to Plan
				I would like you to consider the following regarding Abersoch, because the plan is for a period of 10 years or more:-
1392	Cyng/Counc RH Wyn Williams [367]	POLICY MAN2	Object	Request for increase in shopping area boundary, because by now there are many businesses the length of Lôn Engan and therefore there will be need for a small increase in new development in line with demand and the busyness of Abersoch as a local tourist resort over the next 10 years.
1393	Cyng/Counc RH Wyn Williams [367]	POLICY MAN2	Object	I would like you to consider the following regarding Abersoch, because the plan is for a period of 10 years or more:-  The bounded area should be identified as a Commercial Area to promote work in the tourism industry and benefit the economy.

MAN3 - No Comments

MAN4 - No Comments

### MAN5 – New Retailing in Villages

Rep ID	Person/ Organisation	Section	Support / Object	Summary of Representation / Change(s) to Plan
612	Friends of Borth-y Gest (Tom Brooks) [3036]	POLICY MAN5	Object	Considered that Borth-y- Gest would benefit from a retail outlet since there is no shop in the village. It is considered that Criteria 5 of MAN5 is unnecessary restrictive especially at a time when Gwynedd Council has announced that it is to introduce parking charges on the nearest off-street parking.  Suggested Change Amend criteria 5 of MAN5 new retailing in village (parking arrangements to permit change of use of existing premises to retail premises without any parking constraints being necessary

## MAN6 – Retailing in the Countryside

ı	Rep ID	Person/ Organisation	Section	Support / Object	Summary of Representation / Change(s) to Plan
,	1175	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY MAN6	Object	It is not clear whether this policy would apply to any retail development included within temporary worker accommodation sites.  Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.

## MAN7 – Hot Food Take-Away Uses

Rep ID	Person/ Organisation	Section	Support / Object	Summary of Representation / Change(s) to Plan
831	Cyngor Dinas Bangor (Mr Gwyn Hughes) [1523]	POLICY MAN7	Object	The Council is of the opinion that  - A 10% limit should be imposed on the provision of hot food takeaways in the two areas where the saturation point has already been reached- the bottom of Bangor High Street below the Dean Street junction and Holyhead Road in Upper Bangor.  - Hot food takeaways should not be permitted in the designated prime retail area in the town centre as they create litter, refuse and anti-social behaviour problems which could detrimentally affect the character of the centre.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
866	National Grid (Mrs Rebecca Evans) [2961]	7.3.1	Object	National Grid would expect to see reference to National Policy Statements (NPSs) within the JLDP's policy background on large infrastructure projects, for example paragraphs 7.3.1 to 7.3.17 could contain further information on the role of the NPSs, which is mentioned briefly at the start of Strategic Policy PS8.
1139	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.1	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1156	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.2	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1140	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.3	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1141	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.4	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and

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1142	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.5	Object	description of "associated developments"  The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1143	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.6	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1144	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.7	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1145	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.9	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project.

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				Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1146	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.10	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1147	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.11	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1148	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.12	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
867	National Grid (Mrs	7.3.13	Object	National Grid has some concerns about the description of planning contributions,

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	Rebecca Evans) [2961]			particularly community benefits, within paragraphs 7.3.13 to 7.3.17. National Grid will always seek to reduce the negative impacts of its proposed developments through carefully considered design iterations informed by assessments and consultation; through the identification of comprehensive mitigation measures. It is recognised that in some cases planning conditions may not adequately secure the inherent design and further mitigation measures and these may therefore need to be secured in planning terms through a Section 106 agreement. In the case of Nationally Significant Infrastructure Projects, EN-1 sets out when planning obligations may be used for energy infrastructure, and indicates that weight can only be given to obligations which meet all of the tests for their use. Amend criterion 4 of PS8 and delete criterion 5
1149	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.13	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1150	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.14	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1151	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.15	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit

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				version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1152	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.16	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
1153	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.17	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.  The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"
466	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS8	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres and Hafan-y-Mor may be able to assist in meeting the housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be accommodated via various means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.
843	Nathaniel Lichfield & Partners (Mr Arwel Evans) [2767]	STRATEGIC POLICY PS8	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres and Hafan-y-Mor may be able to assist in meeting the housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be accommodated via various means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.

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1154	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS8	Object	Horizon's representations seek to clarify that it is PS9 which applies to the Wylfa Newydd Project rather than a mix of PS8 and PS9. Having excluded PS 8 from the policy framework for the Wylfa Newydd Project Horizon does not therefore comment specifically on PS8 except to note that any changes made to PS9 (in accordance with its representations below) may be usefully carried through to PS8 for consistency.
464	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS9	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres and Hafan-y-Mor may be able to assist in meeting the housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be accommodated via various means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.
844	Nathaniel Lichfield & Partners (Mr Arwel Evans) [2767]	STRATEGIC POLICY PS9	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres and Hafan-y-Mor may be able to assist in meeting the housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be accommodated via various means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.
862	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS9	Object	A 'plan B' is needed in case this project, which is years away from final approval, does not go ahead.
882	Mr John Tripp [252]	STRATEGIC POLICY PS9	Object	The contractors of Wylfa B to employ 85% + - local people. Need to secure a big training school.
930	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	STRATEGIC POLICY PS9	Support	Some of our assets may require investment to facilitate growth related to Wylfa Newydd. Our AMP investement is regulated both in terms of the amount of funding and the timing o the planned work therefore tere may be instances where developers needs do not coincide with the timing of our investment. Where infrastructure improvements would be required prior to planned investment we would look at other mechanisms to fill this funding gap such as developers' contributions through planning obligations. Once the locations of associated development are confirmed we will assess the impact upon our assets and advise accordingly.
1155	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS9	Object	In order to ensure that the unique opportunity to transform the economy and communities of Anglesey is recognised by the Plan specific Wylfa Newydd Project policies should be developed that along with PS9 should shape the approach to the Wylfa Newydd Project and in particular the proposals for associated development. Recognising the unique status of the development whilst the other policies in the Plan should be properly considered the PS9 and proposed Wylfa Newydd specific policies should take precedence where there is an inconsistency or conflict between them and

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				the other policies. Specific amendments are suggested to criteria 3, 7, 9, 11 & 12.

# 7.4 – Supply and Quality of Housing

# Scale and Type of Housing

## **PS13 – Housing Provision**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
313	Cyfeillion LLyn (Mrs Sian Parri) [2871]	7.4.1	Object	Too many houses for Pwllheli and Botwnnog, the allocation should be distributed through the area's villages which are served by the high school and the surgery, located in Botwnnog.
755	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	7.4.1	Support	In the third bullet point it states "Planning Authorities, in partnership with the community mustdevelop policies to satisfy the challenges and the unique circumstances that are present in specific locations within their areas."  We welcome the observation in the above statement, namely "in partnership with the community" and we hope that everyone follows this guideline.
280	Mr Aled Evans [2646]	7.4.2	Object	The Government's housing objectives  The housing objectives of the County should be prioritised
752	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	7.4.2	Object	It is stated " the Government's housing aims".  Do the aims of the Government correspond with the local aims? Shouldn't it be the local aims that control any development? How rigid are the Government's housing aims?  There is a need for information regarding the statutory nature of the Government's housing aims.
282	Home Builders Federation Ltd (Mr Mark	7.4.3	Object	HBF require clarification if the comments about the market conditions are based on local conditions. HBF would note that in the wider Wales and UK things are more positive. The latest figures from HBF show a 49% increase in residential properties being approved in Wales in 2014. An NHBC Jan 15 figures show a 12% increase in completions in Wales in 2014. Help to Buy has

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	Harris) [1470]			helped over 1300 people buy homes in Wales in the last year.
751	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	7.4.6	Object	It is stated here that " being a house owner is only an option for those on high incomes and for those with equity from other sources, such as from family members or from inheritance".  The 'Llanystumdwy Community Council Area Housing Needs Survey Report' shows that children continue to live at home and that 61.4% cannot even purchase an affordable house.  The Deposit Plan should reflect local needs.
749	Cyngor Cymuned Llanystumdwy (Mr Richard J Roberts) [1550]	7.4.7	Support	We agree with the observation made in this paragraph. There is space for similar developments but on a smaller scale in rural villages also.
86	Y Mg. Carl Iwan Clowes [2728]	STRATEGI C POLICY PS13	Object	The number of homes that the Councils consider necessary to meet the needs of the Plan area, over the Plan period 2011 - 2026. What is the evidence that population projections (natural growth) over the period justifies this amount of housing? The influx which will occur in light of this suggestion is too much for our communities; much less housing is needed, as well as organic vegetation to coincide with the economy's gradual growth.  I would like to see two options. i) should Wylfa B proceed ii) if the plan is approved and Wylfa B
130	Home Builders Federation Ltd (Mr Mark Harris) [1470]	STRATEGI C POLICY PS13	Object	does not proceed, what happens next - empty housing that will be filled by whom??  Object to the reduction in the housing provision form 7,665 as identified in the Preferred Strategy. The document contains no explanation of why this has happened. Do not understand why the number of units have been split into two year periods as there is no phasing policy to support this split(although it is suggested in D26 of the monitoring plan). The plan its self can't maintain a 5 year land supply as stated in the third sentence this is controlled by market forces.  Explain why figure has been reduced. As a minimum increase the Housing provision figure to 7471 and identified opportunities to 8189. Remove the split of housing between the two year periods, The policy refers to it as a target yet the monitoring section at theme 4 D26 seems to indicate it is a phasing constraint. The third sentence should be reworded.
368	Mr Dave Eccles [269]	STRATEGI C POLICY PS13	Object	The current housing requirements are based on figures which are now 4 years old. Population figures appear have shown a decline overall since 2000.  Oversupply would be as damaging to as undersupply in an area so dependent on tourism.  Property prices would drop in the former instance, encouraging more 'second home' buyers and/or

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				an increasing aging population. In the latter instance younger people on relatively lower incomes would find it difficult to buy their own homes as prices increase.
447	WYG/Alliance Planning (Mr Mark Walton) [2905]	STRATEGI C POLICY PS13	Object	The proposed 10% slippage allowance in housing growth is insufficient to take full account of potential barriers to the delivery of housing site in the Joint Authorities Area either by developers bringing sites forward or potential buyers securing funding. More flexibility in terms of the location and choice of available housing sites (allocations) should be provided in the LDP.
647	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGI C POLICY PS13	Support	We support the proposed level of housing provision, allocations to an affordable category, and the broad balanced housing allocation policy.
657	Robert Llewelyn Jones [3058]	STRATEGI C POLICY PS13	Object	I am asking for a plan to include the terraced houses in Holyhead and elsewhere on the island. Plan should be in place to enable them to be updated and to try to improve our present private housing stock. Cities such as Liverpool are in the process of modernising their centres of population, it is time for us to do the same.  Include a radical plan looking at the future for our large stock of terraced houses and working out a
813	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGI C POLICY PS13	Support	plan of action to see them becoming an integral part of our modern housing stock.  PS13 proposes to provide for land for 7902 new housing units over the period 2011-2026 in Ynys Môn and Gwynedd combined (of which 4084 are in Gwynedd and 3817 in Ynys Môn). Of these 468 have already been completed, another 1476 already have planning permission, leaving a net additional need of 2140 in Gwynedd. This represents 3.5% (7% gross) of the existing (2011 census) Gwynedd housing stock. The number compares with 4178 units (3187 net of consented sites) provided for in the GUDP for the period 2001-2016. We support the JLDP housing provision proposal and see no reason to dispute it. We also support 15-20% of housing being allocated to an 'affordable' category.
816	Cyngor Cymuned Tudweiliog (Mrs Glenys Peters) [1236]	STRATEGI C POLICY PS13	Object	Housing should be built in line with the need
817	Cyngor Tref Pwllheli (Mr Robin W Hughes)	STRATEGI C POLICY PS13	Object	The housing provision is not supported as it is too high and will have a detrimental impact on the Welsh language. Reduce the number of housing to reflect the local population.

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	[1235]			
818	Cyngor Gwynedd (Cyng/Counc Ann Williams) [355]	STRATEGI C POLICY PS13	Object	Generally I do not believe that there has been sufficient study of the impact of building so many houses on the Welsh language, in the whole of Gwynedd, or in the individual communities. When talking about Bethesda, it is noted that inward migration is not a significant problem in the area, but it does not note on what basis, or by following what research, this is said. I would be more satisfied if the necessary research was undertaken on the effect that building a substantial number of new houses will have on the language in all parts of the two counties.
821	Jina Gwyrfai [3092]	STRATEGI C POLICY PS13	Object	There is no need for 7,902 new houses. Not enough consideration is being given to the existing housing stock. There are too many empty houses (1,078) in the two counties and a very high percentage of holiday homes. This stock should be looked at and compulsory purchases made before adapting them and renting them for a fair price to local people who are not able to afford any houses at all in their own areas. The population growth does not warrant 8,000. What about the houses on the market that aren't selling? Need to reject the figures and implement firm policies to bring empty houses back into use, to charge a tax on second homes to fund enough rented housing for local people in their communities.
839	Menter laith Bangor (Mrs Branwen Thomas) [2762]	STRATEGI C POLICY PS13	Object	Robust research must be undertaken that relates specifically to Bangor to ascertain the actual need for housing in the city. We believe very strongly that Bangor's role is not to provide a dormitory suburb for workers from north-east Wales and north-west England. Publishing a final version of the Development Plan that is based on this will be harmful to Bangor's Welsh identity and will undermine the Welsh language.
869	Hughes Bros Ltd - [3083]	STRATEGI C POLICY PS13	Object	The balance that is struck between the housing requirement arising within the plan area, environmental constraints and landscape capacity within Policy PS13 will result in a shortfall in new housing. This is highly significant given the need for open market housing, the provision of affordable housing and it will also limit flexibility to cater for different types of residential accommodation, for example housing for older and retired people.  In addition, the 10% allowance for slippage is too low to ensure that housing needs are met.
870	Hughes Bros Ltd - [3083]	STRATEGI C POLICY PS13	Object	The 10% allowance for slippage is too low to ensure that housing needs are met.
903	Barton Willmore (Mr Mark Roberts) [1645]	STRATEGI C POLICY PS13	Object	It isn't clear what consideration has been made on the impact that Wylfa Newydd through the extended construction period would have on the needs for housing in the Plan area. We object to the splitting of the housing requirement to two periods, which would equate to 372 homes per year initially and a doubling to 662 homes per year afterwards. The Plan should simply provide for an annualised requirement of 478 homes over the plan period. This prevents the back loading of the housing requirement and allow the necessary time for applications to be prepared and submitted

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				and permission obtained in order to increase build rates.
959	Cylch yr laith (leuan Wyn) [3128]			
960	Canolfan Hanes Uwchgwyrfai (Geraint Jones) [3130]	STRATEGI		The comments submitted by us in our document relate to housing growth, distribution and allocations, and address the impact of the Deposit Plan on the Welsh Language. The comments draw attention to the deficiencies in the language impact assessments and other documents relating to the Welsh language, and refer to the lack of evidence as well as unreliable evidence.
972	Dyfodol i'r laith (Dr Simon Brooks) [3136]	C POLICY PS13	Object	The total numbers of housing growth for both counties and the growth distribution and the allocations within them should be reviewed. The review should be based on evidence deriving from studies of the following key factors: community need for housing, current housing stock, housing affordability, houses for sale/rent, 2011 Census data, a new language impact assessment in line with socio-linguistic principles.
973	Cymdeithas yr laith (Dr Menna Machreth) [3138]			
974	Cyng./Counc. Alwyn Gruffydd [381]	STRATEGI C POLICY PS13	Object	As the plan notes, policy PS13 is crucial for maintaining and creating safe, healthy, distinctive and vibrant communities. However, the key to acting on this aim is the vitality of local communities. Housing developments should follow vitality and growth rather than creating space to be filled which, like uncontrolled immigration, militates against this objective.
977	Pwyllgor Ymchwil Cymunedau Cymraeg a Chymreig Mon (Robyn Parri) [3141]	STRATEGI C POLICY PS13	Object	Concern is raised regarding six elements:  * «The Coalition Government's Regional Economic Development Strategy 'One Wales' - will lead to the 'Galway-isation' of the most Welsh part of Welsh-speaking Anglesey and the uplands of North Arfon;  * The construction of a second generation of nuclear reactors on Anglesey will again stimulate the demand for additional housing beyond any real local demand; «  * Does not respond to local proven scientific 'demand'; «  * The absence of any Scientific Measure of the Socio-linguistic Impact and the Demography of Economic and Planning Developments on our Welsh language communities; «  * The absence of a linguistic community and economic planning policy. «

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				An economic, social, linguistic and demographic assessment should be held on the real local land development and housing needs of Anglesey and the Menai Straits area on the basis of two assumptions, namely that there will be a new reactor, or that there will be no new reactor.
985	Grwp Ffocws Cynllun Datblygu Lleol (Mr Iwan Edgar) [3050]	STRATEGI C POLICY PS13	Object	The number of units proposed is excessive compared to local need and is likely to cause inmigration which could be detrimental to the Welsh language in its stronghold. Reduce the proposed number of houses in both Counties.
1062	Welsh Government (Mr Mark Newey) [1561]	STRATEGI C POLICY PS13	Object	Further clarity is required to illustrate how the identified targets will be used to maintain a 5 year land supply of housing land. The LPAs should demonstrate that they can provide a 5 year housing supply from the plans adoption, in accordance with Planning Policy Wales, paragraph 9.2.3.
1063	Welsh Government (Mr Mark Newey) [1561]	STRATEGI C POLICY PS13	Object	It is unclear how the proposed phasing of housing development has been derived and how it will be delivered over the plan period. It is noted that the plan has linked its phasing to the development of Wylfa B, however further clarification in relation to specific sites, and deliverability of those sites is required. The authorities will need to control and monitor the housing provision to ensure they achieve the proposed build rates and overall housing requirements (see also monitoring framework)
1276	Cyngor Cymuned Llandderfel (Mrs Bethan Jones) [1257]	STRATEGI C POLICY PS13	Object	We object to the proposal to limit the maximum to two units per cluster for the life of the Plan. It would be better to permit units according to demand and permit the number of affordable housing units as required for local people. There should also be the ability to extend the boundary as required to ensure there are sites for local people on their own land.  Change: Allow houses to be erected according to demand and not limit it to two units for the life of the Plan. Extend the boundary when required to ensure that local people are able to erect dwellings on their own land.
1408	Admiral Taverns [3348]	STRATEGI C POLICY PS13	Object	The proposed slippage allowance in housing growth is insufficient to take account of potential barriers to the delivery of housing site in the Joint Authorities Areas by potential developers bringing sites forward. More flexibility in terms of the location and choice of available housing sites (allocations) should be provided in the LDP. The policy is therefore, unsound as it is unable to respond quickly to changing circumstances.  Slippage allowance should be increased to at least 15% preferable 20% to provide greater flexibility and choice of housing sites.
1428	Marian Elias Roberts	STRATEGI C POLICY	Object	The 7,902 is inappropriate as it is based on national population projections including migration, rather than on a community need for housing. There is no robust evidence held by both councils to

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	[3353]	PS13		show that there is a direct link between the number of housing and community need. This is a fundamental flaw and it should be corrected before moving forward. I am also of the opinion that both councils haven't shown that these developments will not damage the position of the Welsh language in communities. In-migration had had and continues to have a consumptive effect on the Welsh language in the area's towns and villages. The Language Impact Assessment includes sweeping statements without dependable evidence.
1452	Cymdeithas yr laith (Mr Dylan Morgan) [2730]	STRATEGI C POLICY PS13	Object	We do not accept the Deposit Plan in its current form at all. We don't consider that there is robust evidence:  * That there is a community need for the number of houses pot forward;  * That the housing development will not damage the Welsh language's position in communities. We believe that:  * The condition of the Welsh language is of no importance to you;  * It doesn't acknowledge the period's complex economic conditions, only the old lazy assumptions in support of economic growth.  Because it is Wylfa Newydd with the influx of thousands of construction workers from outside the Plan area, which will require accommodation or a home, that drives the Plan, purporting that this project could be of any benefit to the future of Welsh within communities in Anglesey and Gwynedd is deceitful. You should start from the beginning again by conducting detailed language studies of every community in Anglesey.
1453	Dyffryn Nantlle 2020 (Ben Gregory) [3355]	STRATEGI C POLICY PS13	Object	Evidence about population shows that the growth will come from outside the area, with a negative effect on the language. The mitigating measures in the Strategic Policy aren't implemented in Gwynedd now and there is no framework to do so in the future. In Penygroes there is no evidence to show the need for 89 houses - the existing evidence suggests 25 units in 10 years. There is no evidence in the WLIA to support the conclusion that Penygroes can cope with negative effects. Therefore, reduce the number in Penygroes to 30 and in the Plan area the figure should be based on local need.
1460	Mr Alex Badley [255]	STRATEGI C POLICY PS13	Object	We object to Policy PS13 on the grounds that the housing requirement places too much emphasis on the 2011 Household projections and environmental capacity issues. As such the figure originally included in the Preferred Strategy, i.e. 7,665 together with a further 10% slippage allowance, should be reinstated as a minimum requirement. To meet the 5 year residual requirement (5 x 479), 2,395 dwellings should be identified as a minimum, in the period 2014 to 2018. This is in addition to the 917 completed 2011-14 in both authority areas
1706	Eirwen Williams [3094]	STRATEGI C POLICY PS13	Object	I am very concerned about what is proposed in the Local Development Plan for the counties of Gwynedd and Anglesey, and the implications of this for the Welsh-speaking communities of both counties.  The plan seeks to release land in order to build nearly 8000 housing units. I strongly believe that

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1708	Bedwyr Owen (3177)			this figure is incorrect. The Plan should be based on the housing needs of the local population. The work undertaken is insufficient to measure what exactly the housing needs of the local residents in both counties are, and what exactly the implications of implementing the Plan would
1709	Deian Ap Rhisiart (3197)			be on the future of our fragile Welsh-speaking communities.  There is a moral duty on the Councils to do everything in their powers to place the Welsh language and the future of Welsh-speaking communities at the heart of the Plan and I strongly
1710	Adam Jones (3198)			believe that this has not happened in the process of creating the Plan.  Both Councils need to listen to the democratic voice of the people in the consultation process and act accordingly.
1711	Alan Tangi (3224)			
1712	Wyn Williams (3241)			
1713	Dafydd Bates (3267)			
1714	Geraint Parri (3271)			
1715	Mrs Joanna Thomas (2643)	STRATEGI	Object	
1715	Angharad Hughes (3114)	C POLICY PS13		
1716	Ifan Webb (3166)			
	Gareth Lloyd			

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1717	Jones [3171]			
1718	Meirion Williams [3178]			
1719	Angharad Griffiths [3199]			
	Angharad Blythe [3200]			
1720	Sioned Haf [3201]			
1721	Osian Elias [3203]			
1722	Bethan Roberts [3204]			
1723	Randal Isaac [3207]	STRATEGI C POLICY PS13		
1724	Deiniol Carter (3208)			
1725	Gwawr Edwards (3209)			
	Idwal Williams			

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	(3215)			
1726	Trefor Jones - Morris [3216]			
1727	Robert James [3218]			
1728	Eleri Jenkins- Edwards [3219]			
1729	Gwen Gruffudd [3223]			
1730	Lleuwen Steffan [3225]			
1731	Gwilym John [3226]	STRATEGI		
	John Williams [3239]	C POLICY PS13		
1732	Elwyn Jones [3240]			
	Euros ap Hywel [3242]			
1733	Meinir Jones [3243]			

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1734	Eirian Jones [3245]			
	Gwenno Griffith [3249]			
1735	Cai O'Marah [3254]			
1736	Sian Northey [3256]			
1737	Angharad Elias [3263]			
1738	Anna George [3264]			
1739	Dafydd Orritt [3268]	STRATEGI C POLICY		
1740	Dilys Roberts [3269]	PS13		
	Elin Wynne [3270]			
1741 1742	John Trefor Jones [3274]			
1742	Llinos Griffin [3276]			
	Mair Huws			

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1743	Jones [3277]			
1744	Morwenna Williams [3278]			
1745	Olwen Jones [3279]			
1746	Osian Eryl [3280]			
1747	Jina Gwyrfai [3092]			
1748	Cymdeithas yr laith (Mr Dylan Morgan) [2730]	STRATEGI C POLICY PS13		
1749	Elwyn Williams [3095]			
1750	Llinos Parri [3170]			
1751	Sion Jones [3172]			
	Dylan Llyr [3173]			

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1752 1753	Aled Powell [3174]			
1755	Rhian Green [3175]			
1754	Daniel Williams [3176]			
1755	Carl Morris			
	[3179]			
	John Hughes [3202]	STRATEGI		
1756	Annis Milner [3205]	C POLICY PS13		
1757	Lowri Ifan [3206]			
	Bedwyr a Robert Griffiths			
1758	[3210]			
1759	Eleri Davies [3211]			
1760	Seimon Morris [3213]			
	Hedd Gwynfor			

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1761	[3214]			
1762	Medwen Brookes [3217]			
1763	Mared Roberts [3222]			
	Eiri Sion [3227]			
1764	Hefin Jones [3228]	STRATEGI C POLICY PS13		
1765	Llio Davies [3237]			
1766	Mair Pierce [3238]			
	Mari Roberts [3247]			
1767	Elinor Jones [3248]			
1768	Maldwyn Owen [3250]			
1769	Andrew Walton [3251]			

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1770	Angharad Tomos [3252]			
1770	Eddie Ladd [3253]			
1771	Manon James [3255]			
1772	Colin Nosworthy [3257]	STRATEGI C POLICY		
1773	Robin Farrar [3258]	PS13		
	Mared Tudur [3259]			
1774	Phil Steele [3260]			
1775				
1776	Elinor Gray Williams [3261]			
1777				
1778	Justin Davies [3262]			
1779	Bryn Moseley [3265]			
1780	Christine			

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1781	Muskin [3266]			
1782	Gwynfor Jones [3272]			
1783				
1784	Lisa Owen [3275]			
1785	Rhodri Owen [3281]	STRATEGI C POLICY		
1786	Rhys Tudur	PS13		
1787	[3282]			
1788	Tegwen Parri [3283]			
1789	Dafydd			
1790	Williams [3212]			
1791	Tudur Roberts			
1792	[3244]			
1793	Shan Ashton [3358]			
1794				
1795				
1796				

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1801				
1802				
1804				

## TAI 1 – Appropriate Housing Mix

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
215	Home Builders Federation Ltd (Mr Mark Harris) [1470]	Policy TAI 1	Object	Point 4 introduces the idea of a phasing requirement, however no explanation or justification of this is given in the supporting paragraphs. HBF object to the principle of phasing unless it can be justified, a view supported by PPW para 2.5.  Remove reference to phasing in point 4 or justify in supporting text.
414	Grŵp Cynefin (Rhys Dafis) [2953]	Policy TAI 1	Support	The Policy's wording is appropriate to the Plan area.
431	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	Policy TAI 1	Support	It is important to provide a cross-section of housing of different types, new build, inventive and energy-effective, in order to ensure suitable housing for people at different stages throughout their lives. This is very important to keep people in the local community, and therefore to protect the Welsh language.
734	Llanystumdwy Community Council (Mr	Policy TAI 1	Object	It is noted here that 'a Supplementary Planning Guidance for this field will be published to provide more guidance'. We repeat our observations in p.7.1.4.

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
	Richard J Roberts) [1550]			
735	Llanystumdwy Community Council (Mr Richard J Roberts) [1550]	Policy TAI 1	Support	Point 6 says 'Improve the quality and the suitability of the existing housing stock'. We fully agree with this and it should be encouraged at all times rather than building new ones.
957	CPERA (Coun. Elin Walker Jones) [2760]	Policy TAI 1	Object	It is necessary to collaborate with the University to plan for the housing needs of Bangor. A great deal of student dwellings were approved over the past few years and as a result, student flats are everywhere and houses for rent around the city are vacant. These rented housing are not affordable for the social sector as the rent is set for students. Therefore they are currently empty. Therefore, the existing empty houses should be considered before building more houses.
962	Botwnnog Community Council (Mrs Gwenda Roberts) [1541]	Policy TAI 1	Object	In the face of an ageing population, and the emphasis by the government to care for them in their communities, shouldn't the proposed plan ensure that there are purposeful houses for them in the communities in which they live? It is vital that the older people are able to spend the rest of their lives in the community and environment that they have always been used to.
965	Bangor City Council (Mr Gwyn Hughes) [1523]	Policy TAI 1	Object	The Council is of the opinion that the JLDP should include policies to encourage 'Living Above the Shop' in Bangor's High Street. This would:  i) Provide much needed residential accommodation in a sustainable location. ii) Give vacant upper floors of High Street shop buildings an economic use which would result in an incentive for landlords to invest in these buildings. iii) Bring security and vitality back into the town centre. iv) Help to regenerate the High Street.

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
969	CPERA (Coun. Elin Walker Jones) [2760]	Policy TAI 1	Object	The High Street and the city centre should also be used for dwellings, as well as commerce and entertainment. Buildings higher than three storeys should not be permitted while building student flats or halls on non-campus sites.
1267	Rural Housing Enabler (Mr Arfon Hughes) [1189]	Policy TAI 1	Support	A suitable provision of housing in rural areas is important in order to promote sustainable communities, and changes in welfare rights mean that people are forced to move to smaller properties. A higher percentage of the rural population are eager to live in their native habitat and it is important to be able to offer these types of houses for them. There is also an ageing population and the need for housing that is easy to adapt so that people are able to live in their homes and communities for as long as possible. The Rural Housing Enabler for Gwynedd has a central role in this to ensure that this policy contributes to the right type of provision in the County.
1421	NFU Cymru (Dafydd Jarrett) [3285]	Policy TAI 1	Object	The NFU would like to make the following general comments about the Development Management Policies included in the draft Plan. Opportunities that would not prevent the following development:  * In circumstances where it would assist to satisfy a local need for housing, including schemes that conform to the Affordable Housing Policy.

TAI 2 – Subdivision of Existing Properties to Self-Contained Flats & Houses in Multiple Occupation (HMOs)

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
80	Cyngor Cymuned Y Felinheli (Cyng Sian Gwenllian) [2683]	POLICY TAI2	Support	Agree
430	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	POLICY TAI2	Support	Constructing multiple occupation buildings that are suitable for the elderly should be encouraged, for example with one biomass boiler.
523	Bangor Civic Society 1 (Don Mathew) [2988]	POLICY TAI2	Object	TAI 2 HMOs. What is the position if existing non-shared accommodation already exceeds the suggested limits?
526	Bangor Civic Society 1 (Don Mathew) [2988]	POLICY TAI2	Support	TAI2: HMOs - we welcome first attempt to put a cap on non-shared accommodation and use a 'preferred search zone'.
629	Tom Brooks [3034]	POLICY TAI2	Object	Conversion of property that is suitable for families that are converted in this way removes essential homes for younger local residents from the available pool.  Change: The word 'terraced' in qualification 1 should be removed. A new condition should be inserted after A5 that "the property is not listed as being within a relevant settlement in TAI5" should Borth y Gest be added to the list of communities specifically mentioned in TAI 5 Or the new condition should state that "the property is not within a coastal village", should Borth y Gest be considered as in that category.
743	Cyngor Dinas Bangor (Mr Gwyn Hughes) [1523]	POLICY TAI2	Object	The City Council welcomes the curbs and safeguards included in the JLDP regarding this type of accommodation in Bangor and also welcomes the limit imposed on the density of such accommodation in the various wards as set out in the document. However, it is of the opinion that the definition of this type of accommodation need to be made clear and unambiguous in the Plan. The Topic Paper "Student Accommodation" is welcomed as is the commitment to update the data in the Topic Paper on an annual basis.
1177	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY TAI2	Object	Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies (see Horizon representations in relation to Omissions from the Plan) which would be the relevant policies against which to make consultation responses to the DCO application and to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.
1269	Partneriaeth Tai Gwynedd /	POLICY TAI2	Support	The average size of households is decreasing which leads to a change in their constitution, with a higher number of single person households. This, coupled with the changes in welfare policy,

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Gwynedd Housing Partnership (Elfyn Owen) [3052]			means that more people are seeking smaller housing units. Information on the numbers of people seeking on-bedroom properties who have been identified as homeless by the Council demonstrates this. In the same vein, there is a need for 2 bedroom properties to ensure that families who are affected by the welfare policy are able to move to smaller properties. This policy can assist in ensuring that an adequate provision of 1 and 2 bedroom properties are available.

# TAI 3 – New Build Purpose Built Accommodation, Housing in Multiple Occupation and Other Housing with Shared Facilities for Transient Construction workers

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1177	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7:4 Omissions	Object	Horizon requests that clarification be provided as to which of the policies in Chapter 7.4 are intended to apply to the Wylfa Newydd worker accommodation strategy and, more specifically, which aspects of the worker accommodation.  Rather than seek for specific amendments to the policies within this chapter, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.
1178	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY TAI3	Object	On the basis of the suggested Wylfa Newydd policies, references in this policy to "transient construction workers" should be deleted; the policies in this respect should be replaced by the Wylfa Newydd specific policies.  As to the rest of policy TAI3 too, rather than seek for specific amendments to the policy, which is too prescriptive to enable the facilities Horizon will require, Horizon proposes to rely on the Wylfa Newydd specific policies (see Horizon representations in relation to Omissions from the Plan) which would be the relevant policies against which to make consultation responses to the DCO application and to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.

#### TAI 4 – Residential Care Homes, Extra Care Housing or Specialist Care Accommodation for the Elderly

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Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan	
424	Grŵp Cynefin (Rhys Dafis) [2953]	Policy TAI 4	Support	The population is ageing, and a sufficient supply of housing that is suitable for them must be provided. It is important that this includes adapting current housing, rather than over-providing additional housing. We should aim to enable older people to stay in their communities, which in turn adds to the social and economic sustainability of those communities	
1268	Gwynedd Housing Partnership (Elfyn Owen) [3052]	Policy TAI 4	Support	The population is ageing and therefore there is a need for appropriate housing provision such as bungalows, flats or units that can easily be converted. Two extra care housing schemes have been developed in the County with a third scheme due to start in September. Although this model meets some of the ageing population's need, a constant supply that is appropriate or can be adapted for an ageing population such as lifetime homes and the Design Quality Requirement for homes which receive Social Housing grant is needed. The Older People Housing Strategy is based on analytical work to identify areas with a higher density of older people, which can lead to a higher dependency on care services in the future.	
1837	Cyngor Cymuned Llanengan (Ms Einir Wyn) [1548]	Policy TAI 4	Support	This polisi is supported because there is a real need for residential care homes and care homes for the elderly in this community.	

TAI 5 - Local Market Housing

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan	
1031	Welsh Government (Mr Mark Newey) [1561]	Policy TAI 5	Object	Paragraph 9.2.4 of Planning Policy Wales (PPW) makes it clear that market housing to meet specific local housing needs would normally have no occupancy condition. Such a departure from national policies need to be justified with robust evidence. Therefore, the evidence should go further and detail why the affordable housing policies, and the provision of intermediate affordable housing, could not assist in meeting the identified need. Furthermore, paragraph 7.4.39 states that local market housing, allowed under Policy TAI5, will be restricted to those who are eligible by S106 legal agreements. Therefore, it does not comply with PPW, i.e. that the obligation is "necessary to make the development acceptable in planning terms" (PPW 3.7.6).	
599	Cadnant Planning (Mr Rhys Davies) [1366]	Policy TAI 5	Object	Only allowing local market and affordable housing will weaken communities socially and economically, increasing deprivation. National Policy requires a mix of affordable and market housing to ensure sustainable communities. Restricting development to local market housing will result in social imbalance.  Only allowing local need or affordable housing in certain settlements is likely to ensure a failure to deliver the required level of housing. Local need and affordable housing can only be achieved through balanced, viable development (incorporating open market and affordable housing). "Local needs" housing duplicates affordable housing provision and is not necessary or deliverable.  The Policy should be deleted.	
286	Home Builders Federation Ltd (Mr Mark Harris) [1470]  Policy TAI 5 Object		Object	The HBF object in principle to the idea of restricting open market housing to 'local people' as it is an undue constraint on the private market. This policy appears to be over-restrictive on development that is acceptable in principle as it is within an identified settlement boundary or development boundary. Such a policy should be limited to exception sites.  Remove the 'local market housing requirement'.  Add an extra point (1 iii.) which allows open market sale if the other two criteria can not be met.	

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan	
611	Tom Brooks [3034]	Policy TAI 5	Object	TAI5 is unreasonably selective in its choice of "relevant settlements". In the Topic Paper, Borth-y-Gest is attributed with the characteristics of the Porthmadog West ward. The analysis therefore produced a false result in relation to the characteristics of Borth-y-Gest.  Borth-y-Gest, if compared with Mynytho, Sarn Bach etc. would more than equally qualify as a "relevant settlement".  Borth-y-Gest should be added to the list of communities mentioned in TAI 5. Failure to do so is likely to rapidly extinguish the remaining Welsh element in the village and create a ghost village outside the main tourist season.	
70	Nefyn Town Council (Liz Saville Roberts) [2710]	Policy TAI 5	Object	It is requested that coastal villages Morfa Nefyn and Edern are added to the list of Local Market Housing villages in Gwynedd due to the high percentage of second homes. Evidence - according to the 2011 Census, 28.3% of households in the Morfa Nefyn ward (which includes Morfa Nefyn and Edern) are without regular residents. Note that this is higher than a community which is already included, namely Tudweiliog which has a percentage of 19.6%.	
628	Iwan Edgar [251]	Policy TAI 5	Object	Support the principle of the policy but it does not go sufficiently far. The policy should be extended to cover the whole of Dwyfor (+ Penrhyndeudraeth) and to consider this for more areas in Gwynedd and Anglesey.  The Deposit Plan should proactively protect the language and should be consistent with what is expressed in other sections of the Plan.  The 'Gwynedd Housing and Income' report supports the argument for extending the area and shows how unaffordable housing is for the indigenous population and the reports of Hanfod 1 and Hanfod 2 shows that there is some potential influx already in Dwyfor following the housing constructed between 2001 and 2011.	

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633	Cyngor Tref Pwllheli (Mr Robin W Hughes) [1235]	Policy TAI 5	Object	Partly support the 6 areas but need to expand them to include the rest of Dwyfor and consider other areas within Gwynedd.	
635	Grŵp Ffocws Cynllun Datblygu Lleol (Mr Iwan Edgar) [3050]	Policy TAI 5	Object	Support the principle behind this policy - but object to it as it does not go far enough.  The policy should apply to all of Dwyfor and other parts of the two counties.  It should be proactively protecting the Welsh language to coincide with 5.6, 5.8, 6.23, 6.24, 6.25, 7.1.2, 7.1.3, 7.1.4 and Strategic Policy PS1.  The policy should be extended across Dwyfor and in further parts of Gwynedd and Anglesey.	
941	Councillor Alwyn Gruffydd [381]	Policy TAI 5	Object	Policy TAI5, 'Local Market Housing' is to be welcomed warmly but the number of specific settlements which are designated for such a policy must be extended beyond the 6 areas which are currently noted in the Plan.  The results of the recent Census has shown a decline in the percentage of Welsh speakers in the majority of the County's communities, and extending the Local Market Housing areas would be a useful tool to address community and linguistic viability.  Increase the number of specific settlements named under policy TAI5 'Local Market Housing' to protect our communities and safeguard the Welsh language.	
534	Hunaniaith (Ms Debbie Ann Williams) [1307]	Policy TAI 5	Object	Policy TAI5, 'Local Market Housing' is very much welcomed but the number of designated settlements should be extended for the policy, beyond the 6 areas currently noted in the Plan.  The most recent Census results have shown a decline in the percentage of Welsh speakers in the majority of the County's communities and extending the Local Market Housing areas would be a useful tool to address community and language viability.	

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan	
630	Menter Môn (Helen Thomas) [1615]	Policy TAI 5	Object	Policy TAI5, 'Local Market Housing' is very much welcomed but the number of designated settlements should be extended for the policy beyond the 6 areas currently noted in the Plan.  The most recent Census results have shown a decline in the percentage of Welsh speakers in the majority of the County's communities and extending the Local Market Housing areas would be a useful tool to address community and language viability.  Increase the number of specific settlements named under Policy TAI5 'Local Market Housing' in order to protect the communities of Gwynedd and the viability of the Welsh language.	
644	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	Policy TAI 5	Object	There are other villages with significant second home pressure which should be included in this list. We question whether the Section 106 mechanism to require 'local' use (without an affordable condition) can be applied in practice, given the precedent for many of these to have been lifted.	
281	Mr Aled Evans [2646]	Policy TAI 5	Object	Local market housing  Expand the boundaries with this. That would make the market larger e.g. the whole of Dwyfor and Penrhyndeudraeth would be local market	
625	Gwynedd Rural Housing Enabler (Mr Arfon Hughes) [1189]	Policy TAI 5	Support	Welcome the paper that assists people to live in their areas and to contribute to their communities. The paper acknowledges the challenge to "satisfy specific local housing needs for open market housing". The paper makes reference to the intermediate model, and the Unit would welcome this option. A number of people cannot afford to buy a house, but do not fall into the category of needing social housing.  Information from Tai Teg and Gwynedd's Common Housing Register shows that there is a need for housing and more work is needed at grass roots level to ensure the validity of this need in terms of local need.	

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
638	Gwynedd Housing Partnership (Elfyn Owen) [3052]	Policy TAI 5	Support	Welcome the paper which assists people to live within their areas and contribute to their communities. It acknowledges the challenge to meet specific local housing needs for open market housing. Reference is made to the intermediate model and the Unit would welcome this option. A number of people cannot afford to buy a house but do not fall into the category of needing social housing.  Information from Tai Teg and Gwynedd's Common Housing Register clearly demonstrates that there exists a need for housing.
428	Grŵp Cynefin (Rhys Dafis) [2953]	Policy TAI 5	Support	Policy TAI5 is suitable for the situation of the communities that have been noted in it
82	Planning and Housing Department, Denbighshire County Council (Angela Loftus) [2719]	Policy TAI 5	Support	Support the principle of the policy to limit open market homes to local need in areas of high demand for second homes.

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan	
207	John Brinley Jones [2087]	Policy TAI 5	Object	To remove Policy TAI5 from the final version. Policy is against the European Convention on Human Rights - Protocol No. 12 to the Convention for the Protection of Human Rights and Fundamental Freedoms Rome, 4.XI.2000.  To remove para 7.4.37 Policy TAI5 from the final version.	
66	Beaumaris Town Council (Prof TW Ashenden) [1267]	Para. 7.4.37	Support	There is a lack of affordable housing in Beaumaris. The increasing number of holiday homes and lets makes the situation worse. Beaumaris Town Council welcomes the application of a local market policy to Beaumaris.	
205	John Brinley Jones [2087]	Para. 7.4.39	Object	It should be noted that business owners that create employment and wealth in the area who require a home in one of these villages and have a plot that they should not be subjected to very stringent affordable sized dwellings since they may require additional facilities within their homes such as office space or areas where they could work from home.  To consider each planning application on merit rather than have a blanket policy on size of the dwelling that obviously can not meet all requirements.	
206	John Brinley Jones [2087]	Para. 7.4.39	Object	The occupancy of local market housing will be restricted to those who are eligible, without a Section 106 legal agreement. Maximum size of units will be decided on merit and requirements of applicant. No blanket policy on size restraint.  Remove section 106 and maximum size restraint.  To consider each planning application on merit rather than have a blanket policy that obviously can not meet all requirements.	
1837	Cyngor Cymuned Llanengan (Ms Einir Wyn) [1548]	TAI 5	Support	Real need for local market housing in Abersoch, Mynytho and Sarn Bach. Too many open market homes/ flats have been built in the last two years that are beyond the ability of local people to purchase them, bearing in mind that there are over fifty houses for sale and not one of them is below a quarter of a million.	

TAI 6 - Purpose Built Student Accommodation

Comment	Name	Section	Туре	Summary of Comments / Changes to the Plan	
Number					
674	Mr Noel Davey, Council for the Protection of Rural Wales	Policy TAI6 Student Accommodation	Object	The area for student accommodation would seem to be too large and there are fears that the student population may not be able to fill it, thus leaving Bangor with an excess of single-person housing.	
726	Hughes Brothers Ltd	Policy TAI6 Student Accommodation	Object	Feel the policy is too restrictive without justification for some of the matters sought such as support from a higher education institute, prohibit development within primarily residential area, prevent development on sites with extant planning permission or allocated for residential development where development would not prejudice meeting housing needs and the justification for the policy should explain that the preferred search zone does not preclude the development of student accommodation elsewhere if it satisfies the criteria within the policy. Suggested amendments are given to the criteria within the policy to reflect the above mentioned issues.	
738	Gwyn Hughes, Bangor City Council	Policy TAI6 Student Accommodation	Support	The Council welcomes the criteria set out in this policy relating to the siting of such developments and also welcomes the inclusion of the Preferred Search Zone of the Proposals MAP.	
942	Menter laith Bangor	Policy TAI6 Student Accommodation	Object	Very careful consideration should be given to permitting further residential developments for the students of Bangor University. In the face of uncertainty regarding students' ability to fund their higher education away from home, a decline in the demand and excess of empty accommodation in private hands would be severely detrimental to the stability of Bangor's communities and the Welsh language. A detailed investigation should be undertaken into the housing needs of the people of Bangor. Include Penrhosgarnedd in the city! It should be ensured that rented housing is affordable rather than charging an inflated rent as is paid by students.	

## TAI 7 - Replacement Dwellings

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
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Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
604	Cadnant Planning (Mr Rhys Davies) [1366]	Policy TAI 7	Object	It is considered that not allowing the replacement of temporary residential accommodation such as prefabricated houses is unreasonable and undeliverable. If the unit has lawful residential use it should have the right to be redeveloped under the replacement dwellings policy.  This policy should be reviewed and the policy requirement number 5 and paragraph 7.4.47 should be deleted.
642	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	Policy TAI 7	Object	Criterion 7 should also apply WITHIN DEVELOPMENT BOUNDARIES. Our concern arises especially from the experience of rebuilding holiday homes in coastal communities such as Abersoch, where replacement dwellings have been approved of much greater scale, volume and footprint than the original structure. We think the policy should be reinforced explicitly in respect of replacement dwellings. The present text gives the impression that these conditions would not apply within development boundaries. We note that TAI 7 criterion 6 requires a replacement dwelling to be 'within the same footprint as the existing development' whether within or outside the development boundary.
737	Llanengan Community Council (Ms Einir Wyn) [1548]	POLICY TAI7	Support	Too many houses have been removed/demolished in this community in recent years - a dozen since 2010 - and enormous houses have been erected to replace traditional and indigenous buildings.

## TAI 8 – Residential Use of Caravans, Mobile Homes or Other Forms of Non-Permanent Accommodation

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan	Comments and recommendations of officers
641	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY TAI8	Object	23.4 Single Statics Summary. We are concerned about the proliferation of single static caravans in rural areas, often in exposed and unscreened locations, which have an adverse impact on the landscape. Policy TAI8 does not adequately address the problem which arises in part from unsatisfactory UK	Not accepted –  Policy TAI8 clearly states those circumstances where it would be appropriate to provide a static caravan in a rural location for residential use. The policy clearly states the temporary nature of such units and it also notes that "the siting"

	legislation. New legislation relevant to Wales is needed, but in the meantime planning policy should make clear a commitment to monitor siting and use of single static caravans and, wherever practicable, enforce conditions of colouring and screening that would mitigate landscape impact.  Change: commitment to increase planning control over proliferating single statics.	of temporary residential caravans or other forms of non-permanent accommodation will be subject to the same locational considerations as permanent residential dwellings".  Other policies, such as Policy PCYFF2, are also relevant to this extent, specifically in terms of the impact of such units on the landscape.  Recommendation
		There was no compelling evidence to justify amending the Deposit Plan in order to ensure the soundness of the Plan.  No change

## Affordable Housing

#### **Context and Introduction**

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
750	Rhys Llwyd [3087]	Para. 7.4.60	Object	I'm concerned that there is not enough emphasis on affordable housing in the plan, especially for local young first-time buyers.  There is a need for suitable housing to respond to the local need on two levels:  i) to respond to the local need in terms of numbers;  ii) to respond to the local need in terms of the price.  Why not include conditions that 75%+ of the houses will be affordable for local people and approve 25% or 15% or 10% only for unaffordable houses. It is sad to see that the plan does not consider assisting first-time buyers to restore houses that are already in the housing stock and to consider them as affordable houses.
1033	Welsh	Para. 7.4.65	Object	Planning Policy Wales (PPW, paragraph 9.1.4) states the importance of local authorities

	Government (Mr Mark Newey) [1561]			understanding their whole housing system so they can develop evidence based market and affordable housing policies. A key component of this evidence base will be a Local Housing Market Assessment (LHMA).
				Paragraph 9.2.16 (PPW) also states that LDPs should include an authority-wide delivery target for affordable housing, based on an LHMA. The LDP should express the total affordable housing need (including any backlog) over the whole plan period in the reasoned justification to the affordable housing policy.
310	Home Builders Federation (Mr Mark Harris) [1470]	Para. 7.4.66	Object	HBF consider that the £5,000 allowance for S106 contributions in the viability testing is too low. The draft SPG on Developer Contributions due to be prepared for the inquiry should help to clarify this. The report also identifies that a high % of units are delivered on smaller sites, the HBF believe that a number of the assumption used in the testing are taken from National Builders figures and do not fully represent the type and range of development taking place in the borough.
				Reconsider figures used for S106 contributions in viability report. Liaise with small builders to understand viability on small sites better and feed results into viability testing.
1036	Welsh Government (Mr Mark Newey) [1561]	Para. 7.4.66	Object	Further clarification is required to explain what costs, related to the obligations/ contributions have been taken on board. The viability work does include this aspect but the specific costs are unclear. It is for the authorities to demonstrate what other planning obligations/contributions will, or will not cover (see also comments in relation to deliverability).  Challenging targets need to be grounded in evidence and applicable to the majority of applications, whilst allowing site specific negotiations to occur, if/ where necessary (on a limited number of sites). All components of the viability evidence need to be justified.

## PS14 – Affordable Housing

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
	Llanystumdwy			It is stated here that 'Sufficient land is identified to provide a minimum target of 1,400 new affordable homes'.
727	Community Council (Mr Richard J	Strategic Policy PS14	Object	Does this mean that the remainder of the houses, around 4,500 will not be affordable?
	Roberts) [1550]			Our evidence (Llanystumdwy Community Council Area Housing Needs Survey) confirms that local people do not have the means to buy even an affordable home.

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
				Need to increase the percentage of affordable homes within the Plan.
63	Mr Aled Evans [2646]	Strategic Policy PS14	Object	This means that there will be far too many houses that aren't affordable which will have to be included in the plan. The Council's language and housing study shows this.  A much larger percentage of affordable housing
1179	Horizon Nuclear Power (Miss Sarah Fox) [2919]	Strategic Policy PS14	Object	Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.
1034	Welsh Government (Mr Mark Newey) [1561]	Strategic Policy PS14	Object	The authorities need to explain the relationship between the target within the LHMA and the level of affordable/ market housing proposed in the plan. It is necessary for the authorities to demonstrate that they are maximising provision through the LDP given the high level of need. Further clarification is required to explain what delivery rates are expected from current commitments and how allocations will contribute to the affordable housing need target. It remains unclear how 1,400 affordable housing will be delivered and whether the authorities have explored all options to maximise provision through the LDP given the very high level of needs identified for the first 5 years of the plan alone i.e. relationship to market housing.
434	Grŵp Cynefin (Rhys Dafis) [2953]	Strategic Policy PS14	Support	There is a need to be completely clear what the term "affordable housing" means when implementing this policy
1266	Coun. R.H. Wyn Williams [367]	Strategic Policy PS14	Support	Welcome any policy and plan for affordable housing in the area with evidence of local need also, for the benefit of our communities.
283	Mr Aled Evans [2646]	Strategic Policy PS14	Object	Affordable housing  Increase the minimum target to reflect what, it seems as though, the County's residents can afford. 61.4% of Gwynedd's residents cannot afford to buy a house and therefore things do not make sense. It is required to reduce the number of houses in the Plan down, and increase the percentage of affordable housing.

TAI 9 – Affordable Housing Threshold & Distribution

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
728	Llanystumdwy Community Council (Mr Richard J Roberts) [1550]	Policy TAI 9	Object	Chwilog is in the category of 15% of affordable homes. To coincide with the Llanystumdwy Community Council Area Housing Needs Survey Report, there is a need to increase it to 60-70%, and not 15%.
273	Mrs Marian Jones [2832]	Policy TAI 9	Object	Affordable Housing  15% of affordable housing in Llŷn.  Therefore, who will buy the remaining 85%? There is evidence that shows that 60%+ of Gwynedd residents cannot afford to buy houses.  Will this open the floodgates for more non-Welsh speaking migrants?
68	Nefyn Town Council (Liz Saville Roberts) [2710]	Policy TAI 9	Object	The percentage of affordable housing in the Llŷn area should be 25%.
951	Gwynedd Rural Housing Enabler (Mr Arfon Hughes) [1189]	Policy TAI 9	Support	The policy TAI 9 noting the need to have a 'pro-rata payment' rather than having no affordable provision on the site at all is to be welcomed, as this secures help to gain a supply of affordable housing which could be of help to Housing Partners to ensure that a scheme is viable.
1035	Welsh Government (Mr Mark Newey) [1561]	Policy TAI 9	Object	In order to maximise affordable housing delivery and meet the key objective, the viability work has identified hotspots related to specific geographical areas within the plan area. The authorities should consider whether the wording of TAI9 is strong enough to negotiate much higher percentages of contributions from these specific hotspots.
1263	Gwynedd Housing Partnership (Elfyn Owen) [3052]	Policy TAI 9	Support	The Housing Partnership is eager to promote suitable developments within areas of need, and table 8.2 of the Housing and Population Topic paper clearly states 'that planning permissions for housing granted to public bodies / Housing Associations form a low proportion of the residential units considered within the Joint Housing Land Availability Study for Gwynedd (April 2013).' This shows the small impact of the work of the Housing Associations compared to the private sector. Housing Policy 9 notes that 'a pro-rata paymentrather than no affordable provision on the site' would be welcomed as this would ensure assistance for a supply of affordable housing, and could help housing Partners in ensuring that a scheme was viable.
443	Cynefin Group (Rhys Dafis)	Policy TAI 9	Support	The 'amount of houses in the development' threshold for the different type of communities is suitable.

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
	[2953]			The percentage of affordable housing in the development based on its location is suitable.
				The requirement to receive a community sum on sites where it is not possible to provide affordable housing is appropriate, so that there is a way to plan affordable housing or social housing on other sites in the same area in order to be viable.
60	Beaumaris Town Council (Prof TW Ashenden) [1267]	Policy TAI 9	Support	There is a lack of affordable housing in Beaumaris. The increasing number of holiday homes and lets makes the situation worse. Beaumaris Town Council welcomes the application of the affordable housing policy to Beaumaris (25% in developments of 5 or more units) and Llanfaes (100%).
345	Mr Geoff Wood [2916]	Policy TAI 9	Object	The policy does not consider new housing in open countryside (although this is dealt with elsewhere) and it is unclear what the affordable housing commitment would be for such development. Add an additional level to the hierarchy that makes reference to new dwellings and the conversion of dwellings in open countryside. This should make reference to Strategic Policy PS15, for clarity.
288	Home Builders Federation Ltd (Mr Mark Harris) [1470]	Policy TAI 9	Object	The wording of 3 ii. needs clarification as, if properties are required to be built to DQR standards (definitely required by RSL's if grant is provided to the scheme) then it will not be possible to comply with this requirement due to size and external requirements. Need extra wording to 3 iii. to cover independent arbitration where viability can not be agreed between the Council and the developer.
1043	Mr Mark Newey, Welsh Government	Policy TAI 9	Object	LDP affordable housing policies should not include the range/type/mix of housing as matters could change over the lifespan of the plan and potentially inhibit the delivery.  However, LDPs should include reference to the latest information within the reasoned justification to enable effective negotiation. Dependent on the mix, which may have financial implications, the delivery of affordable housing (percentage sought on site) could also be impacted. The LMHA does assess the full range of housing requirements, but this is not referenced specifically in the LDP. The plan would benefit from including such information which could be factored into the viability calculations to demonstrate consistency with the evidence and no adverse implications.
129	Home Builders Federation Ltd (Mr Mark Harris) [1470]	Para. 7.4.68	Object	Why has a two instead of three stage approach been taken to the affordable % requirement and why have areas been included which have been shown aren't currently viable or may become un-viable if current market conditions continue?  Explain why a two tier approach instead of the 3 tier approach has been taken, and why areas with negative residual value are being required to provide affordable housing.

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
108	CPERA (Cynghorydd Elin Walker Jones) [2760]	TAI 9 (paragraph 7.4.69)	Object	I realise that affordable housing is needed in Bangor. Need houses for rent and private ownership. Need housing and flats with 1/2/3 bedrooms. Need gardens for children. No detailed work has been undertaken on the needs of the people of Bangor. Need to collaborate (e.g. with the University) to see what is required - plenty of vacant houses for rent by now.
698	Barton Willmore (Mr Mark Roberts) [1645]	Para. 7.4.69	Object	The requirement to provide at least 25% affordable housing is not acceptable, as it implies no upward limit on the need for affordable housing to be sought on development sites. The level should be specified as up to 25% affordable housing.  Policy does not consider the impact of s106 burdens. Policy does not set a differential rate for affordable housing based on previously developed or the green field sites. Does not consider development viability and does not reflect PPW.

## TAI 10 - Exception Sites

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
645	Friends of Borth-y Gest (Tom Brooks) [3036]	Policy TAI 10	Object	Exception sites adjoining but outside development boundaries lead to unplanned development creep and ribbon development creation. This may be justifiable for 100% affordable housing sites where a need for such small developments exist but is not justifiable for any open market exceptions. As drafted this policy would go well beyond Planning Policy Wales guidance.  That TAI 10 be amended to refer only to permitting 100% affordable housing. This can be achieved by deleting the latter part of the policy.
984	Rob Booth [3033]	Policy TAI 10	Object	There should be no open market houses outside the development boundary.
1032	Welsh Government (Mr Mark Newey) [1561]	Policy TAI 10	Object	Policy TAI10 states that in exceptional circumstances open market housing may be included to make a proposal viable. However, sites that include a mix of market and affordable housing cannot be classed as 'exception sites' under national policy - TAN 2 explicitly states that such sites are not appropriate for market housing (para. 10.14).
945	Gwynedd Rural Housing Enabler (Mr Arfon Hughes) [1189]	Policy TAI 10	Support	I welcome this policy that will be of assistance to ensure that a suitable model is developed within areas, more than likely rural areas. Providing affordable housing schemes is difficult to achieve without the assurance that market units are available to cross-subsidise a scheme.  There is a strong link here with the Local Market Housing Policy. It's a method of ensuring that developments occur within areas where there is a clear need for affordable housing with an element of selling on the open market in order to ensure that schemes are

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
				viable.
1262	Gwynedd Housing Partnership (Elfyn Owen) [3052]	Policy TAI 10	Support	We welcome this Policy that will assist in ensuring that suitable models are developed within areas, probably rural areas. We can provide information that shows that some schemes are more difficult than others to realize without assurance that there are units available to subsidise the scheme. Table 7.13 in the 'Housing and Population' Topic Paper on Rural Exception Sites shows the numbers of developments on exception sites, with clear comparisons to be seen in the numbers. The strong link here with the Local Market Housing policy is a means of ensuring that developments occur within areas where there is a need for affordable housing with an element of selling on the open market in order to ensure that schemes are viable. This will facilitate the development of Community Land Trusts within specific areas.
309	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	Policy TAI 10	Object	This policy risks damaging sites or features of local biodiversity value or important features in wildlife/green corridors. Insert reference to the need to comply with other policies of the Plan especially those related to the protection of biodiversity.
446	Grŵp Cynefin (Rhys Dafis) [2953]	Policy TAI 10	Support	Policy TAI10 is greatly welcomed. It will provide homes for those that local house prices on the open market are well out of their reach. A planning guideline will be required regarding the nature and source of the evidence of need that will have to be submitted to support a planning application.
452	Grŵp Cynefin (Rhys Dafis) [2953]	Para. 7.4.79	Object	A planning guideline should be provided to explain the nature of the evidence that will be acceptable when aiming to justify including open market housing
449	Grŵp Cynefin (Rhys Dafis) [2953]	Para. 7.4.83	Support	This will avoid stigma and will ensure that the affordable housing receives the same construction focus.

# **Gypsy Traveller Accommodation**

#### **Context and Introduction**

Rep ID	Person/	Section	Support /	Summary of Rep
	Organisation		Object	
1028	Welsh	7.4.90	Object	Clarification is required on how and when the additional 16 permanent pitches and what the
	Government		-	authorities' need are in relation to the 28 transit pitches (identified as being required across North
	(Mr Mark			Wales), and when these are required. The authorities have acknowledged that not every group

	Newey) [1561]		of Gypsies and Travellers can be accommodated on the same site, and the authorities need to clarify whether this has been taken into consideration when making provisions for Gypsies and Travellers.
1673	Welsh Government (Mr Mark Newey) [1561]	Object	Text in Topic Paper 18 Identifying Gypsy and Traveller Sites states that all sites included within a range of listed criteria will be discarded However, the designation of C1 flood zone should not be automatically discarded. Such sites should be subject to a justification test instead of further limiting potentially suitable options.

## Policy TAI 11 – Safeguarding Existing Gypsy & Traveller Sites

Rep ID	Person/ Organisation	Section	Support / Object	Summary of Rep
1076	Welsh Government (Mr Mark Newey) [1561]	POLICY TAI11	Object	Policy TAI11 - relates to the safeguarding of existing sites, the phrase should be widened to: "safeguarded as a permanent residential site to be solely used by Gypsies and Travellers".
1260	Partneriaeth Tai Gwynedd / Gwynedd Housing Partnership (Elfyn Owen) [3052]	POLICY TAI11	Object	Local Authorities must conduct a survey of the needs of Gypsies and travellers by February 2015, and this will be a follow-up to the work undertaken in 2011. This will provide us with current information on needs, and we intend to commission this work on a regional basis. The Housing partners will support this work.

## TAI 12 – Gypsy and Traveller Site Allocations

Rep ID	Person/ Organisation	Section	Support / Object	Summary of Rep
1074	Welsh Government (Mr Mark Newey) [1561]	7.4.97	Object	Further clarification is required in relation to step 4 (relating to the 'detailed site assessment') and policy should also reflect that the process is in relation to finding public Gypsy and Traveller sites, as opposed to private sites.
1075	Welsh Government (Mr Mark Newey)	7.4.99	Object	By including 'up to 5 days at a time' restricts the Local Authorities in future if they found this time limit was counter-productive. It also states that a transit site of 15 pitches could be required to accommodate 15 caravans.). However, the Welsh Government's Designing Gypsy and Traveller Sites guidance states each transit pitch should be capable of accommodating two tourer caravans. Therefore, a site of 8 pitches should

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	[1561]		suffice.

TAI 13 – Sites for Gypsies and Traveller Pitches

Rep ID	Person/ Organisation	Section	Support / Object	Summary of Rep	Comments and Recommendations
1077	Welsh Government (Mr Mark Newey) [1561]	POLICY TAI13	Object	These criteria relate specifically to residential sites and do not allow for future transit site needs. Criterion 2 is not clear that public transport links are not always available, particularly where sites are allocated in accordance with paragraph 7.4.102. Criterion 4 is extremely flexible due to the use of the word "including." Consider limiting these factors to those already mentioned and add "unless mitigation is possible and proportionate." Criterion 6 is unreasonable as the guidance applies to Local Authority sites and not private sites. Clarify that public sites should have regard to that guidance whilst private sites would be regulated under the Mobile Homes (Wales) Act 2013. Criterion 9 is already covered by policy TAI11.	It is suggested that Policy TAI13 is amended to take account of the comments submitted. Whilst it is accepted that private sites would be regulated under the Mobile Homes (Wales) Act 2013. It is considered that the Good Practice Guidance by Welsh Government about designing sites for Gypsies and Travellers should continue to be referred to, but make it clear that, in the case of private sites, that compliance with it isn't compulsory. Include wording to say that the local planning authorities consider that private providers should consider it when they design sites and try to address as much as possible of the guidance. It is considered that the Council should not have lower design expectations for the design of new private sites and extensions compared to public sector sites.  Recommendation  Amend text as outlined above to ensure clarity and to ensure that the policy can be easily interpreted.  Focussed Change: NF:74
1078	Welsh Government (Mr Mark Newey) [1561]	7.4.104	Object	Paragraph 7.4.104 could be reasonable in relation to permanent residential sites but not in relation to transit occupants.	Accepted  It is suggested that paragraph 7.4.104 is amended to take account of the comments received.  Recommendation

					Amend text as outlined above to ensure clarity.  Focus Change: NF:75
1079	Welsh Government (Mr Mark Newey) [1561]	7.4.105	Object	Paragraph 7.4.105 should clarify that private site developers should not be required to live in the area before submitting a site planning application as this could otherwise have the effect of limiting freedom of movement. Welsh Government planning circular 30/2007 makes clear that such a requirement would be unacceptable and contrary to national policy	Accepted Omit reference to local connections in the text and Policy TAI 13.  Recommendation Amend text as outlined above to demonstrate that appropriate regard is made to National Policy and Guidance.  Focus Change: NF75

#### **Location of Housing**

## PS15 – Settlement Strategy

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
289	Home Builders Federation Ltd (Mr Mark Harris) [1470]	7.4.113	Object	More provision should be provided by Sub-Regional Centre & Urban Service Centre. These centres are more sustainable and where the market wants to build houses and people want to live. Also the local needs and affordable housing restrictions on village, cluster and open countryside housing mean that these (1,976) units will not contribute to an open market housing total.  Increase the % of housing provided in Sub-Regional Centre & Urban Service Centres. Remove the restriction of 'local market housing' on the areas identified above.
626	Dr Morag McGrath [231]	7.4.113	Object	It is difficult to justify development in open countryside. Table 18 shows that Anglesey already has 141 units above the proposed numbers for the entire of the plan period (and 43 over in the clusters).

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Change: There should be a presumption against any further developments in open countryside on Anglesey unless very exceptional circumstances.
				Tables 18/19 identify the number of units with existing planning permission.
				Existing permissions should be considered, however they must be reviewed so that only sites likely to be developed in the plan period are included.
699	Barton Willmore (Mr Mark Roberts) [1645]	7.4.113	Object	Many sites obtain planning permission but are not built. A full schedule of sites relied upon should be provided.
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			Distribution of housing within different settlement categories should be disaggregated to identify the overall level of growth currently committed to individual settlements.
				In making new allocations, the effect of existing commitments should be considered and compared to the relative size, role and function of each settlement.
1061	Welsh Government (Mr Mark Newey) [1561]	7.4.113	Object	The total of allocations and windfalls appear to fall short of the figure included in the plan at table 17 (1,502 - page 153). The authority needs to ensure the total of allocation and windfall in villages tally to the figure in the plan and ensure this is delivered and that a large number of housing will not be able to be developed in one or a few small villages, as set out in the plan's housing strategy.
83	Beaumaris Town Council (Prof TW Ashenden) [1267]	STRATEGIC POLICY PS15	Object	The settlements between Llanfairpwllgwyngyll and Llanfaes operate as a suburb of Bangor. Demands on housing in Bangor are driven by the economic success of Bangor and the A55 corridor to the east. As a result the balance of housing allocation between the centres of Holyhead, Llangefni and Amlwch and the settlements along the Menai Strait inappropriately favours Holyhead, Llangefni and Amlwch with a result that the current shortage of affordable housing in this area will be made worse. Some of the allocation of new housing to Holyhead, Llangefni and Amlwch and Bangor should be redirected to the settlements of Llanfairpwllgwyngyll, Menai Bridge, Llandegfan and Beaumaris.
132	Beaumaris Town Council (Prof TW Ashenden) [1267]	STRATEGIC POLICY PS15	Object	Insufficient weight has been given to the role of the Beaumaris/Llanfaes area as a suburb of Bangor. Demands on housing in Bangor are driven by the economic success of Bangor and the A55 corridor to the east. As a result the balance of housing allocation between the centres of Holyhead, Llangefni and Amlwch and Beaumaris/Llanfaes inappropriately favours Holyhead, Llangefni and Amlwch with a result that the current shortage of affordable housing in Llanfaes/Beaumaris will be made worse. A greater allocation of housing should be made to the Beaumaris/Llanfaes area.  Some of the allocation of new housing to Holyhead, Llangefni and Amlwch should be redirected to Llanfaes.
284	Mr Aled Evans	STRATEGIC	Object	Reduce the numbers approved in the large centres, and increase the numbers in the clusters and the

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[2646]	POLICY PS15		rural areas
292	Home Builders Federation Ltd (Mr Mark Harris) [1470]	STRATEGIC POLICY PS15	Object	Consider more housing should be provided in the Sub-regional centres and urban service centres, as this would be more sustainable and provide housing in areas where the markets wants it.
347	Mr Geoff Wood [2916]	STRATEGIC POLICY PS15	Object	In some circumstances, it may be appropriate to restore vernacular buildings (including abandoned dwellings) in the open countryside to help preserve local character and / or Welsh heritage. This type of development is not currently considered within the policy.
354	WYG/Alliance Planning (Mr Mark Walton) [2905]	STRATEGIC POLICY PS15	Support	Our Client, Admiral Taverns, supports the proposed location and distribution split of housing within sustainable settlements especially the importance of Service Villages in continuing to deliver up to 25% of the housing growth in the Joint Authorities area.
461	Tai Twnti Cyf [2868]	STRATEGIC POLICY PS15	Object	<ol> <li>Morfa Nefyn is a settlement suitable for modest open market housing growth.</li> <li>Additional open market housing sites would not harm the plan strategy nor the welsh language.</li> <li>Additional land could be allocated for housing or the development boundary extended to accommodate development. Two sites are suggested.</li> </ol>
482	Mon a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	STRATEGIC POLICY PS15	Object	The proposals in respect of distribution of housing growth are insufficiently compliant with national planning policy, which "advises that local development plans should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities". Reduced focus on Bangor and the A55 corridor and more attention to smaller communities.
651	Friends of Borth- y Gest (Tom Brooks) [3036]	STRATEGIC POLICY PS15	Support	Policy PS15 - Settlement Strategy - restricts coastal villages to "within development boundaries in-fill or windfall sites". An indicative potential of 10 such sites is allocated to Borth-y-Gest. We not that this is neither a target or a limit.  We support this policy especially "Development will be restricted to a scale and type to address community need for housing on windfall/ infill plots within development boundaries. No open market sites will be allocated in these Villages".
701	RCH Douglas Pennant [3070]	STRATEGIC POLICY PS15	Object	Objection to the restriction of growth in Talybont to 2 windfall dwellings over the plan period and the absence of a development boundary. Objection to the sustainability assessment for Talybont (settlement score). The current approach actually puts at risk the viability of local services. Change: a development boundary to permit an increased number of dwellings in Talybont, which would better support the local services.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
729	Llanystumdwy Community Council (Mr Richard J Roberts) [1550]	STRATEGIC POLICY PS15	Object	Point (ix) states, 'Only development that complies with Planning Policy Wales and TAN6 will be permitted in the Open Countryside'.  We disagree with this as we feel that it closes the door on any development in the countryside, which is totally contrary to the nature of this area.  The Plan does not sufficiently address the indigenous nature of countryside developments, such as this area.
730	RCH Douglas Pennant [3070]	STRATEGIC POLICY PS15	Object	Objection to the restriction of growth in Llandygai to 8 windfall dwellings over the plan period and the drawing of the development boundary. Objection to the sustainability assessment for Llandygai (settlement score). The current approach actually puts at risk the viability of local services. Changes: a wider development boundary to permit an increased number of dwellings in Llandygai, which would better support the local services.
814	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGIC POLICY PS15	Support	A broad 'balanced' housing allocation policy, as consulted on last year, is proposed, comprising: up to 55% in Bangor and the main towns (including Caernarfon, Pwllheli, Porthmadog), at least 20% in Local Service Centres (including Abersoch, Criccieth, Nefyn), and up to 25% in smaller centres. We support this approach.
822	Botwnnog Community Council (Mrs Gwenda Roberts) [1541]	STRATEGIC POLICY PS15	Object	It is noted that 3% of new housing will be provided in the countryside during the Plan period. This is a very low number consideing the number of years that the Plan will be in operation. Again there is a need to attract young people to stay in their neighbourhood therefore there will be security in the future for our schools, heritage, etc.
835	Tudweiliog Community Council (Mrs Glenys Peters) [1236]	STRATEGIC POLICY PS15	Object	There is a lot of concern about over-development in Botwnnog and Pwllheli and that it will have a significant impact on the Welsh language.
836	Cyng./Counc Ann Williams [355]	STRATEGIC POLICY PS15	Object	I feel that the windfall provision of 82 properties is adequate for Bethesda.  I greatly hope that the lands which have already been allocated for building are included in this figure, as there is already a substantial allocation for my ward. This would mean that the figure of 82 properties would already have been reached through planning permissions that have already been granted, and applications that are pending.
837	AONB Joint Advisory Committee	STRATEGIC POLICY PS15	Object	New housing. There was concern about the level of housing provision in the Llyn area and the possible impact that could have on the community and the well-being of the Welsh language. There was specific concern about the provision for Botwnnog and Pwllheli, which seems excessive considering

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	(Cynghorydd Gruffydd Williams) [3090]			these settlements' size and character.
838	Llannor Community Council (Mr Haydn Jones) [1549]	STRATEGIC POLICY PS15	Object	The Plan provides an indicative figure that there is a need to construct 40 houses in the village of Ffôr between 2011 and 2026. Planning permission has already been granted to construct nine houses which reduces the need to 31 houses. There is reference to a planning application for 40 houses on a site that has already been designated, but has not received planning permission. The Community Council does not support adding to the figure of 40 houses for the village of Ffôr.
841	Jina Gwyrfai [3092]	STRATEGIC POLICY PS15	Object	There is no demographic need for more housing in Deiniolen - there are enough market/ vacant housing already. Safeguarding natural Welsh communities is what is important here. No more housing in Deiniolen (or the adjoining areas - Clwt y Bont, Gallt y Foel, Dinorwig). Generally only new housing according to natural growth for local people.
842	Jina Gwyrfai [3092]	STRATEGIC POLICY PS15	Object	As an individual whose roots are in Barmouth, I feel strongly that there is no need for more houses in the town (or in Llanaber). The area is being ruined by overdevelopment and inward migration. I cannot find any evidence in the Plan or on grass roots level to justify constructing 91 new houses. Windfall developers are the only people who profit from these schemes. There is no consideration to the welfare of residents and the community. Remove Barmouth from the Plan.
868	Hughes Bros Ltd - [3083]	STRATEGIC POLICY PS15	Object	The sub-regional centre of Bangor and urban service centres, specifically Llangefni are capable of, and should, accommodate a greater percentage of the housing requirement in order to facilitate best use of resources and infrastructure and to deliver a sustainable pattern of development. Moreover, by indicating that "up to" 55% of the plan's growth should be located within main centres, the policy has the effect of placing a limitation which is not consistent with the strategy of the plan, particularly where developments could be accommodated without offending other policy objectives.
895	Barton Willmore (Mr Mark Roberts) [1645]	STRATEGIC POLICY PS15	Object	Housing growth should be directed to the largest settlements and areas on a proprtional basis reflecting those settlements size, role and function. 55% is directed to the sub-regional centre/urban service centres. 45% is distributed to villages/ clusters, resulting in a significant dispersal and diffusion of housing provision. Housing will be directed to areas with limited opportunities for modes of travel other than the car as well as limited opportunities for employment and key services and facilities. Need to direct at least 60% to the Sub-regional/ Urban Service Centres, 25% to local service centres and 15% to villages and clusters.
907	Llanddeiniolen Community Council (Ms Eleri Bean) [1531]	STRATEGIC POLICY PS15	Object	Forty houses have been apportioned to Deiniolen. On what basis are the authors of the plan stating that this many houses are required? Sadly there are 5 new houses in the middle of the village, which are empty, and the fear is that they will remain vacant. A detailed local need survey is required for every similar village, but unfortunately the proposed Plan doesn't include this at all. By undertaking a local survey the requirements of each community would be found - is the real need for housing for the elderly, rented housing etc. The plan guesses where housing should go.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
911	CPERA (Cynghorydd Elin Walker Jones) [2760]	STRATEGIC POLICY PS15	Object	Research work at a community level was undertaken in several areas in Gwynedd, following consent from the Council to do this. Nonetheless, this did not take place in Bangor. Bangor's needs differ slightly from the rest of the County; it is a regional centre that is recognised as such by the Welsh Government, and therefore, in order to undertake such research in Bangor, there would be a need to carefully co-ordinate this, and also include Penrhosgarnedd, which is part of the Pentir ward. There is a need to look again at which parts of Gwynedd comes within Bangor's boundary.
936	Richard Williams [3120]	STRATEGIC POLICY PS15	Object	The figures show that in future, fewer houses will be needed in the Porthmadog area than in Penrhyndeudraeth. The residents of Porthmadog need better arrangements to ensure that there is a better stock of housing in the community. We cannot accept the argument regarding floods here in Port as there have never been floods here. There is a real need for development here in Porthmadog to improve our housing stock. Our young people and older people need new houses, not in Penrhyndeudraeth, but here, in their own community.
938	Llanfihangel Esc Community Council (Alun Foulkes) [3121]	STRATEGIC POLICY PS15	Object	Concerns regarding the overdevelopment of the village of Gaerwen in permitting too many houses, especially when there are already empty houses in the village. It is important that the houses which are built are appropriate for the location and that a number of affordable houses are permitted.
939	Menter laith Bangor (Mrs Branwen Thomas) [2762]	STRATEGIC POLICY PS15	Object	Too many houses to be built in Bangor. We are concerned about the impact on the Welsh language. A detailed study should be completed on the whole of the City of Bangor's housing needs (including Penrhosgarnedd) - needs to be defined as an entity. No such work has been undertaken in the past.  Undertake a detailed study on housing needs and the impact on the Welsh language in Bangor as one entity, rather than looking at a single ward (Hirael). Need to include Penrhosgarnedd as well.
1030	Welsh Government (Mr Mark Newey) [1561]	STRATEGIC POLICY PS15	Object	The strategy of the plan is not questioned; however the growth limitation created by policy wording for the main centres has not been justified. It would seem logical to create growth limitations for the lower tiers rather than for the most sustainable areas.
1682 1683	Cylch yr Iaith (Ieuan Wyn) [3128]  Canolfan Hanes Uwchgwyrfai (Geraint Jones)  Dyfodol i'r Iaith (Dr Simon	STRATEGIC POLICY PS15	Object	The comments submitted by us in our document relate to housing growth, distribution and allocations, and address the impact of the Deposit Plan on the Welsh Language. The comments draw attention to the deficiencies in the language impact assessments and other documents relating to the Welsh language, and refer to the lack of evidence as well as unreliable evidence. The total numbers of housing growth for both counties and the growth distribution and the allocations within them should be reviewed. The review should be based on evidence deriving from studies of the following key factors: community need for housing, current housing stock, housing affordability, houses for sale/rent, 2011 Census data, a new language impact assessment in line with socio-linguistic principles.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1684	Brooks) [3136] [3130]			
1685	Cymdeithas yr laith (Dr Menna Machreth) [3138]			
1805	CPERA (Cynghorydd Elin Walker Jones) [2760]	STRATEGIC POLICY PS15	Object	Certainly there is a need for housing within the city's community boundaries. Affordable housing is required; rented housing and housing for sale. Housing that is managed by Housing Societies if required. Family housing with three bedrooms, housing or flats for individuals or couples or small families; affordable houses/ flats with one, two or three bedrooms. Housing with suitable gardens for children. Children should be able to play safely in their gardens rather than in large green areas without fencing in front of houses. Work has already been undertaken to demonstrate a need for affordable housing in the county (GC, 2013)

## TAI 14 – Housing in Sub-Regional Centre & Urban Service Centres

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
285	Mr Aled Evans [2646]	POLICY TAI14	Object	Housing in the centres.  Changes to plan - Too much housing for the benefit of the language. Housing in these centres will empty the Countryside e.g. more houses in Pwllhelli = less people staying in Pen Llyn. Difficulties will occur in due course for schools and Ysgol Botwnnog specifically.
290	Ms Bethan Roberts [2747]	POLICY TAI14	Object	Too much houses are to be built.  Changes to plan - Build according to the need. Would it not be better to permit Welsh speaking people to build as needed? There will be a worse influx than there is now, and the Welsh language will die sooner than it is now.
406	Dr Richard Roberts [2938]	POLICY TAI14	Object	No evidence of local housing need which justifies the number that has been designated for Pwllheli. Building so many houses would have a detrimental impact on the Welsh language.
654	Campaign for the Protection of Rural Wales (Mr Noel Davey)	POLICY TAI14	Object	We are concerned by the high proportion of windfall sites and the relatively few allocated housing sites which means there is relatively little guidance as to where housing will be located especially in the smaller settlements. Clarification is required as to why some sites have been withdrawn and boundaries redrawn, while other boundaries have been extended even though no sites are specified.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[1169]			
753	Mr Rob Booth [3033]	POLICY TAI14	Object	The policy should state that developments of more than 9 houses must include at least 10% of houses that are affordable. Developments of more than 20 houses must include at least 20% of affordable houses, developments of more than 50 houses should include 30% of affordable housing/housing association houses and developments of 100 or more should include 50% of affordable/housing association houses.
833	Barton Willmore (Mr Mark Roberts) [1645]	POLICY TAI14	Object	The distribution does not reflect the role, size and function of the settlements. Caernarfon only has three proposed housing sites with a total of 194 homes. In contrast the settlements of Amlwch and Llangefni which are half the size of Caernarfon, are to receive twice the level of growth from new allocations or indeed taking account of existing commitments. The Plan therefore does not provide sufficient development to allow Caernarfon to be a viable, sustainable and growing settlement (Objectives of Wales Spatial Plan and Planning Policy Wales) and indeed the Vision of the Plan for Caernarfon. We propose that additional housing of at least 400 should be directed to Caernarfon and its immediate surrounding area whilst the level of housing at Amlwch and Llangefni and local service centres should be reduced by circa 400 homes - see representation about former Friction Dynamics site.
1698	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI14	Support	* The proposed windfall growth for these settlements may impact upon DCWW water and sewerage assets. As the location of any windfall development is not yet known we will make an assessment and comment on proposed development sites at the time of the planning application.
1699	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI14	Object	* There are isolated incidents of flooding in the public sewerage system in the following settlements that may need to be resolved to allow development to proceed:  Bangor, Caergybi/Holyhead, Llangefni, Caernarfon, Pwllheli  Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990. It may be necessary for modelling assessments to be undertaken to establish where the proposed development could connect to the public sewerage system.
1700	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI14	Object	* The proposed growth being promoted within the catchment area of the following WwTW would require improvements at the treatment works:  Bangor Treborth, Caernarfon  The improvements would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

TAI 15 – Housing in Local Service Centres

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
50	Councillor Charles Jones [2621]	POLICY TAI15	Support	Satisfied with the way the development boundary has been drawn.
69	Nefyn Town Council (Liz Saville Roberts) [2710]	POLICY TAI15	Object	Reduce the growth level of Nefyn to reflect the growth scale between 2001 and 2011 so that housing developments reflect local needs. Nefyn Town Council is not of the opinion that there is a need for 37 additional houses in Nefyn between now and 2016, which is the number noted in the Deposit version, March 2015. It is felt that the 30 houses on the landbank are sufficient for local need. Evidence - 21 houses were built in Nefyn between 2001 and 2011. During that period, there was a reduction of 3% in the percentage of Welsh speakers in Nefyn. It is appreciated that there is no direct link between the percentage of Welsh speakers and housing developments, but the Council is of the opinion that a correlation exists between them in this area.
102	Beaumaris Town Council (Prof TW Ashenden) [1267]	POLICY TAI15	Object	INCREASE ALLOCATION OF HOUSING IN BEAUMARIS AND LLANFAES  Insufficient weight has been given to the role of the Beaumaris area as a suburb of Bangor.  Demands on housing in Bangor are driven by the economic success of Bangor and the A55 corridor to the east. As a result the balance of housing allocation between the centres of Holyhead, Llangefni and Amlwch and Beaumaris inappropriately favours Holyhead, Llangefni and Amlwch with a result that the current shortage of affordable housing in Beaumaris will be made worse. A greater allocation of housing should be made to the Beaumaris/Llanfaes area.  Some of the allocation of new housing to Holyhead, Llangefni and Amlwch should be redirected to Beaumaris.
316	Mr Paul Green [2908]	POLICY TAI15	Object	The allocation of development to Lllanfairpwll, Menai Bridge, Llandegfan and Beaumaris should reflect their connection to the Bangor regional hub. Some of the housing currently allocated to Holyhead, Amlwch and Llangefni should be allocated to the settlements along the Menai Strait.
522	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY TAI15	Object	Surprised that no new housing sites are proposed in Bethesda, with 82 houses to be met through 'windfall'. The GUDP site Nr Maes Coetmor, which we understand has been consented, is outside the development boundary. Did not consider this a suitable site because of the density and inadequate access. Oppose housing (SP633) to the green open fields to the north, comprising high quality agricultural land and contribute to ribbon development. We would support housing on a number of centrally situated brownfield sites, subject to resolution of any flooding problems.
754	Mr Rob Booth	POLICY	Object	Why no housing sites? Why is GUDP site excluded from boundary?  TAI15 should state that developments of more than 9 houses must include at least 10% of houses

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[3033]	TAI15		that are affordable. Developments of more than 20 houses must include at least 20% of affordable houses, developments of more than 50 houses should include 30% of affordable housing/housing association houses and developments of 100 or more should include 50% of affordable/housing association houses.
1431	Penrhyddeudraeth Town Council (Mr Glyn Roberts) [1261]	POLICY TAI15	Object	Alarm bells should be ringing clearly and urgently given that there was only a 2.2% increase in the number of Welsh speakers between 2001 and 2011 in Penrhyndeudraeth, that the population aged between 20- 29 has fallen by 6.1%, whilst the 65 and over age group has risen by 16% and that the number of migrants has risen from 169 to 242 (+43,2%) between 1991 and 2001. (An analysis of 2001 - 2011 figures would have shown an even higher increase). The status of the Welsh language in Penrhyndeudraeth isn't at a point where one can be reassured any more. That there are inconsistencies and contradictions and an inability to recognise the significance of statistics can't be avoided.
1695	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI15	Support	* The proposed windfall growth for these settlements may impact upon DCWW water and sewerage assets. As the location of any windfall development is not yet known we will make an assessment and comment on proposed development sites at the time of the planning application.
1696	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI15	Object	* There are isolated incidents of flooding in the public sewerage system in the following settlements that may need to be resolved to allow development to proceed:  Beaumaris, Benllech, Bethesda, Gaerwen, Llanfairpwll, Rhosneigr, Valley, Abermaw/Barmouth, Abersoch, Llanberis, Llanrug, Nefyn, Penygroes and Tywyn.  Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990. It may be necessary for modelling assessments to be undertaken to establish where the proposed development could connect to the public sewerage system.
1697	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI15	Object	* The proposed growth being promoted within the catchment area of the following WwTW would require improvements at the treatment works:  Beaumaris, Cemaes, Porthaethwy/Menai Bridge (Bangor Treborth), Pentraeth, Rhosneigr & Criccieth.  The improvements would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

TAI 16 - Housing in Service Villages

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
211	LLANBEDROG COMMUNITY COUNCIL (MR JOHN HARRIS) [2810]	POLICY TAI16	Object	Recommend that Llanbedrog is included as a servicing village / centre. Llanbedrog scores 28 points on topic paper 5, one less than Botwnnog. Llanbedrog has a school, a village hall, shops, a garage, pubs, a cafe, hotels, a gallery and arts centre, a golf course, an industrial estate, older people's homes, a chemist - almost as much services as Abersoch.
364	Mrs Gwyneth Evans [2887]	POLICY TAI16	Support	I would like to support the Cae Cefn Capel, Botwnnog site. I believe that Botwnnog is an ideal village to expand as there are so many facilities here e.g. a primary school and a secondary school (save transportation costs as there is a pavement all the way from the site to both schools) a surgery, a post office, a cafe, a church and a chapel.
423	Dr Richard Roberts [2938]	POLICY TAI16	Object	No evidence of local housing need which justifies the number designated for Chwilog and Y Ffôr. Building this much houses would have a detrimental impact on the Welsh language.
627	Carter Jonas (Mrs Charlene Sussums-Lewis) [2829]	POLICY TAI16	Support	The proposed allocation of circa 30 residential units on Site T66 (Land near Maes Bleddyn Rachub) is supported for the following reasons:  1. Deliverability - the site is under single ownership.  2. Allocated Housing Numbers - residential allocations in Service Centres will count towards the delivery of housing growth.  3. Development Principle - T66 can accommodate 30 dwellings over the plan period.  4. Opportunities and Constraints - the plan demonstrates that the site is feasible.  5. Indicative Masterplan- the site could be developed with minimal impacts.  6. Positive Sustainability Appraisal - the site is in accordance with the plan strategy.
1701	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI16	Support	* The proposed windfall growth for these settlements may impact upon DCWW water and sewerage assets. As the location of any windfall development is not yet known we will make an assessment and comment on proposed development sites at the time of the planning application.
1702	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI16	Object	* There are isolated incidents of flooding in the public sewerage system in the following settlements that may need to be resolved to allow development to proceed:  Newborough  Potential developers can either wait for DCWW to resolve the flooding, subject to funding being

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.
				* The proposed growth being promoted within the catchment area of the following WwTW would require improvements at the treatment works:
1703	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI16	Object	Llanerchymedd, Bethel (Treborth Bangor WwTW), Bontnewydd (Llanfaglan WwTW), Rachub (Bethesda WwTW).
				The improvements would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

# TAI 17 – Housing in Local, Rural & Coastal Villages

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
95	Elizabeth Whitehead [2742]	POLICY TAI17	Support	Confirm support subject to correct interpretation-  * Planning applications must conform to all points of TAI17.  * Development is restricted to within outline boundaries (map 55)  * Preference is given to Sustainable living SO5 - whilst respecting the varied role and character of the centres, villages and countryside.  * Preference is given to protect and enhance the natural and built environment SO16 - Protect, enhance and manage the natural and heritage assets of the Plan area, including its natural resources, wildlife habitats, and its landscape character.
200	Rhys Thomas [2738]	POLICY TAI17	Support	I support the proposal to restrict development to WITHIN the development boundary for Llangristiolus as shown on the interactive map, being a Local Village as defined within STRATEGIC POLICY PS15: Local Villages: "Development will be restricted to a scale and type to address community need for housing on windfall/ infill plots WITHIN DEVELOPMENT BOUNDARIES."
209	John Brinley Jones [2087]	POLICY TAI17	Object	Llanbedrog should be classed as a Service Village and not as a Coastal Village. Llanbedrog has many services since Pen Y Berth is also within the parish of Llanbedrog. Llanbedrog should be encouraged to grow and be successful but if it is categorised as a Coastal Village then it will have an unfair disadvantage against other villages in Dwyfor.  Remove Llanbedrog from the list of Coastal Village and add it to the list of Service Village
212	LLANBEDROG	POLICY	Object	Object to Llanbedrog's designation as a Coastal village and wish to see it included as a Service

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	COMMUNITY COUNCIL (MR JOHN HARRIS) [2810]	TAI17		Village. Recommend that Llanbedrog is included as a service village. Llanbedrog scores 28 points on topic paper 5, one less than Botwnnog. Llanbedrog has a school, a village hall, shops, a garage, pubs, a cafe, hotels, a gallery and arts centre, a golf course, an industrial estate, homes for older people, a chemist. Almost as much services as Abersoch. The village boundary was shrivelled last time, and it is needed to expand the boundary. A flexible boundary is required to address local housing need, not necessarily affordable housing only. Not everyone wants the strict conditions of affordable housing.
616	Cater Jonas (Mr Chris Bell) [3041]	POLICY TAI17	Object	Objection to the restriction of growth in Tregarth to 13 windfall dwellings over the plan period and the drawing of the development boundary. Objection to the sustainability assessment for Tregarth (settlement score). The current approach actually puts at risk the viability of local services.
634	Secretary of State for Defence [3045]	POLICY TAI17	Object	Inadequate social and community facilities within the Llanfihangel yn Nhowyn settlement to support the current housing stock. Residents rely on base facilities at RAF Valley for these facilities. This has resulted in increasing volumes of vehicular/pedestrian traffic leading to a number of traffic 'near misses'. The Council shouldn't rely on the base facilities to serve the local community and its growth, particularly if problems continue.  Change: amend wording to encourage the establishment of additional community facilities to serve LyN and to prevent any further growth of the village unless the range and scale of supporting facilities is increased.
708	Carter Jonas (Mrs Charlene Sussums-Lewis) [2829]	POLICY TAI17	Support	The proposed development boundary alteration for the inclusion of Site East of A466 (SP678) Llanaelhaearn is supported for the following reasons:  Deliverability - Positive Planning Allocated Housing Numbers Development Principle Opportunities and Constraints - As attached in Appendix 1 Indicative Masterplan - As attached in Appendix 2 Positive Sustainability Appraisal
709	Carter Jonas (Mrs Charlene Sussums-Lewis) [2829]	POLICY TAI17	Object	Open Market Housing to be permitted in Local/Coastal/Rural Villages.  The policy should contain a definition of what 'community need' means.  Sites within such villages are at a disadvantage to sites under policy TAI 10 in that open market housing is not allowed under policy TAI 17.
731 & 733	RCH Douglas Pennant [3070]	POLICY TAI17	Object	Objection to the restriction of growth in Llandygai to 8 windfall dwellings over the plan period and the drawing of the development boundary. Objection to the sustainability assessment for Llandygai (settlement score). The current approach actually puts at risk the viability of local services.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Changes: a wider development boundary to permit an increased number of dwellings in Llandygai, which would better support the local services.
764	Cadnant Planning (Mr Rhys Davies) [1366]	POLICY TAI17	Object	Providing only affordable housing within Local, Rural and Coastal Villages will weaken communities socially and economically, increasing deprivation. National Policy requires a mix of affordable and market housing. Restricting development to 100% affordable housing will lead to social imbalance.  Only allowing local need or affordable housing in certain settlements is likely to ensure a failure to deliver the required level of housing. Local need and affordable housing can only be achieved through balanced, viable development (incorporating open market and affordable housing).  Alter policy to provide a mix of affordable and open market housing within Local, Rural and Coastal Villages.
832	Jina Gwyrfai [3092]	POLICY TAI17	Object	Here is a policy that can defend small local communities. Shouldn't criteria i) & ii) be the basis for the whole Plan? Having said that a clearer definition of 'affordable housing' is required in the context of community. 67% can't afford the cheapest house due to poor wages (much lower than in other areas). More "Tai Teg" rented housing is required rather than houses for sale. This policy should form the basis of all planning apart from Bangor/ Holyhead the sub-regional centres. Restrict house building to natural change.
1188	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI17	Support	There are no known water supply issues to impact upon the delivery of the growth identified within these settlements, however a full assessment will be made at the time of a planning application once the location of development is known.  The adequacy of the sewerage network will be assessed at the time of a planning application once the location of development is known.
202	John Brinley Jones [2087]	7.4.124	Object	How was the figure 16 new dwellings for Llanbedrog calculated. Does this figure include all types of new dwellings including holiday homes. A survey conduced in 2007 for Llanbedrog Parish Council concluded that 28 families wanted to move into the village. 10 affordable homes were built but apparently these 10 have already been included in the figure and another 3 that are holiday homes have also been included leaving on 1 to be built in Llanbedrog over the plans lifetime which is not enough considering that we would like to see some more growth in Llanbedrog.  Increase number from 16 to at least 28 and this figure should not include second or holiday homes. Change Table 20 relating to explanation paragraph 7.4.124 - Indicative growth level in coastal villages from 16 to 28 and state figures should not include holiday / second homes. Perhaps reduce dwellings required in Pwllheli by 12 and add them to Llanbedrog.
210	LLANBEDROG COMMUNITY	7.4.124	Object	To increase the growth level of Llanbedrog from 16 to 28 units. In 2007 the Council undertook a review of the need for housing in Llanbedrog, and it became apparent that there was a need for 28

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	COUNCIL (MR JOHN HARRIS) [2810]			houses. 12 affordable houses were built, which leaves 16 as destitute. In the Plan there is no provision for this. Does this figure include second homes?
213	LLANBEDROG COMMUNITY COUNCIL (MR JOHN HARRIS) [2810]	7.4.124	Object	The restrictions placed on Coastal/Rural villages are too strict. It is important to have growth. It is important to have growth to safeguard the village's character, in order to enable a variety of local need housing to be built, and not necessarily only affordable housing.

### TAI 18 - Housing in Clusters

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
383	Mr Emyr Jones [2935]	POLICY TAI18	Object	This policy defines the village of Llanfaes as a cluster. A more appropriate categorisation would be as a local village, given its size and characteristics. There are discrepancies in the assessment process which has been carried out, given that Talwrn for example, a settlement similar in characteristics to Llanfaes, has been defined as a local village. There is a need for both affordable and market housing in Llanfaes to support and develop local services. The site identified as SP49 in the Candidate Site Register would be a suitable site for small scale expansion of the village.
442	Mr B Pritchard [2951]	POLICY TAI18	Object	The village of Brynteg has not been included within any classification characterised as being capable of receiving new housing development. This is an oversight as the village displays many of the characteristics associated with other local villages and clusters. Talwrn for example, a similar village, has been classified as a local village. It is essential for the social and economic well-being of Brynteg that new development is promoted and such a designation given. There are suitable sites for such development within the village, including site ref SP162 in the list of Candidate sites.
497	Tref Alaw Community Council (Miss Anna M Jones) [1402]	POLICY TAI18	Object	Item 6 within the paragraph states that occupancy is restricted in perpetuity.  This will result in it being impossible to obtain a mortgage on the dwelling.  The Plan intends to 'empty' the countryside of residents and create ghettos in the towns.
574	Cadnant Planning (Mr Rhys Davies) [1366]	POLICY TAI18	Object	* Clusters should be upgraded as a settlement to include a development boundary's  * There should be a specific housing allocation to deliver a combination of open market and affordable housing to meet the actual local need for such dwellings  * The identified clusters are generally sustainable settlements with good transport links. The clusters should not be limited in their growth as additional community services and facilities

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				would be supported thereafter.  * This will support the needs of local communities which formally supported a number of services and facilities throughout the year; more suitably that an overly onerous policy which restricts the number of dwellings to be built to two and would reduce the impact of the concentration of holiday accommodation.  * It is considered that providing only 2 affordable dwellings within clusters will weaken communities both socially and economically resulting in an increase in deprivation. It is identified within National Planning Policy that there is a requirement to provide a mix of affordable and market housing within settlements in order to create and maintain sustainable communities. Restricting housing development to 100% affordable housing will result in the social imbalance of settlements and therefore contrary to national planning policy.
648	Friends of Borth-y Gest (Tom Brooks) [3036]	POLICY TAI 18	Object	Policy PS15 - Settlement Strategy - restricts coastal villages to "within development boundaries in-fill or windfall sites". An indicative potential of 10 such sites is allocated to Borth y Gest. It is noted that this is neither a target or limit.  I support this element of the policy especially "Development will be restricted to a scale and type to address community need for housing on windfall/infill plots within development boundaries. No open market housing sites will be allocated in these villages."  However, the need in Borth y Gest on in-fill sites is for affordable housing and not for open market. Change Borth-Y-Gest to a Cluster.
702 & 703	RCH Douglas Pennant [3070]	POLICY TAI18	Object	Objection to the restriction of growth in Talybont to 2 windfall dwellings over the plan period and the absence of a development boundary. Objection to the sustainability assessment for Talybont (settlement score). The current approach actually puts at risk the viability of local services. Change: a development boundary to permit an increased number of dwellings in Talybont, which would better support the local services.
732	Llanystumdwy Community Council (Mr Richard J Roberts) [1550]	POLICY TAI18	Object	Pencaenewydd and Rhoslan have been included in the clusters table.  Why is Llanarmon not included? It has been included as a rural village in the Gwynedd Unitary Development Plan and we feel that it should be included again as a cluster. After all, it has a Church and the same bus service that serves Pencaenewydd and Llangybi runs through the village.  Llanarmon should be included in table 21.
736	Llanengan	POLICY	Object	It makes no sense that a village as large as Llanengan, with a pub, chapel, church and busy

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	Community Council (Ms Einir Wyn) [1548]	TAI18		social centre (where the Ysgol Feithrin is held) is considered a cluster like Sarn Bach and Machroes. Local need homes have been built in the village over the last five/six years and there is room for further infill - there is an application submitted at the moment. Six affordable/local need homes have already been approved.  This classification should be reconsidered as a rural village in order to allow a four affordable / local need homes in Llanengan during the LDP's lifetime rather than the two that are allowed as a cluster.
970	Councillor Elwyn Edwards [399]	POLICY TAI18	Object	I feel that the proposed plan regarding the amount of affordable housing approved for local need is insufficient as it stands (2 houses) over the life of the plan (up to 2026). I would like to change the wording of the amount of housing to (As Required) over the plan period rather than 2.
1094	Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY TAI18	Support	NRW welcomes that housing within the rural clusters will be 100% affordable housing.
1272	Mr & Mrs O R & M Roberts [2955]	POLICY TAI18	Object	<ol> <li>Rhostrehwfa is named as a cluster, this site is infill between Llangefni and Rhostrehwfa</li> <li>The infill area should be incorporated within either the Rhostrehwfa or Llangefni and is infill between the relevant inset maps</li> <li>A cluster is 10 no of units or more and this area exceeds there required numbers</li> <li>The whole area from inset map Rhostrehwfa and Llangefni should be amended, to reflect a cluster in TAI18.</li> </ol>
1277, 1278 & 1279	Llandderfel Community Council (Mrs Bethan Jones) [1257]	POLICY TAI18	Object	We object to the proposal to limit the maximum to two units per cluster for the life of the Plan. It would be better to permit units according to demand and permit the number of affordable housing units as required for local people. There should also be the ability to extend the boundary as required to ensure there are sites for local people on their own land. Change: Allow houses to be erected according to demand and not limit it to two units for the life of the Plan. Extend the boundary when required to ensure that local people are able to erect dwellings on their own land.
1291	Penmynydd a Star Community Council (Mr Rhys Davies) [3295]	POLICY TAI18	Object	Penmynydd has a strong community hub and we would wish to see opportunities for future generations to stay within the village. The village should be identified as a cluster in the LDP under policy TAI18 and table 21 of para 7.4.128.
1399	DP Jones [2063]	POLICY TAI18	Object	Llanddaniel North East should be identified as a Cluster, comprising a cohesive group of dwellings with an urbanised appearance and of a character similar to other clusters identified in TAI18. It is not located in the AONB, its inclusion affords an opportunity as part of an overall strategy to reduce pressure on a nationally significant landscape. Llanddaniel North East has

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				also been identified as a cluster in the appeal decision enclosed with the submission. It is also in an exceptionally sustainable location due to its proximity to sustainable and other transport modes, primary school and the settlements & facilities listed.
1459	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI18	Object	* The following settlements do not have public sewerage facilities therefore the provisions of Circular 10/99 'Planning Requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development' apply and consultation with Natural Resources Wales will be required:  Anglesey: Brynteg, Capel Coch, Capel Mawr, Capel Park, Carmel, Cerrigman, Hebron, Llanfairynghornwy, Llanynghenedl, Marianglas, Pentre Canol, Penygraigwen, Red Wharf Bay, Trefor, Tyn Lon.  Gwynedd: Aberpwll, Penrhos (Caeathro), Ceidio, Dinas (Llyn), Friog, Llanaber, Llangwnadl, Treborth, Waun (Penisarwaun)
1461	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI18	Support	There are no known water supply issues to impact upon the delivery of 2 dwellings per cluster, however a full assessment will be made at the time of a planning application once the location of development is known.
1462	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY TAI18	Support	* The adequacy of the sewerage network will be assessed at the planning application stage once the location of development is known.
1668	Mr Hayden Sandom [2931]	POLICY TAI18	Object	The group of houses subject to this representation (Cae Ficer) is a cohesive, tight and easily defined and contains sufficient dwellings to be considered a cluster. It is therefore suitable for inclusion within the plan as a cluster.
1803	Peter Day [2103]	POLICY TAI18	Object	My proposal for a new cluster to be known as the 'Moranedd' be included since it has thirteen existing properties which complies with all criteria / requirements for acceptance. This has not been included and I ask that it be included. A scale plan is attached with the thirteen properties forming the proposed 'Moranedd Cluster' shown in red. Location is within 600m of a signed and recognised bus stop and from the bus stop there are services enabling arrival at major employment centres by 9a.m. 'Public Centres' within one kilometre include: Marianglas Village Hall, Parciau Public House and Goronwy Owen Hall.
964	Cyngor Cymuned Botwnnog (Mrs Gwenda Roberts) [1541]	TAI 18 (Map 172 Bryncroes)	Object	The Plan refers to only 2 houses being permitted in the village of Bryncroes - this number is very limited considering the number of years the proposed Plan will be in force. Again this limits the rights of the individual.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
471	Mr E Jones [2957]	7.4.125	Object	The village of Llanddeiniolen has not been designated as a cluster settlement within this policy. This must be an oversight as the village displays many of the same characteristics of size, scale and services of nearby Pentir, for example. It is important for small villages such Llandeiniolen that new development is forthcoming to support the village and enhance services. Overly restrictive policies of constraint will not enhance the life of the village. Small scale additions to the village can be appropriate and site SP90 on the Candidate Site register is just such a site
425	Mr G Dale [2954]	7.4.128	Object	The village of Paradwys is not included in the list of cluster villages. This is an oversight as the village displays many of the same characteristics of other local village clusters such as nearby Star. It is important for the overall health of the village and the support and extension of village services that new development is forthcoming and suitable land is made available for this. The site referenced SP184 in the Candidate Register is such a site. To include the village of Paradwys as a defined cluster village. To identify site ref SP184 as part of the village cluster.

## 7.4.130 New housing in the countryside

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
481	Mr Geoff Wood [2916]	7.4.130	Object	The paragraph does not take consideration of circumstances when it may be appropriate to create or re-establish a dwelling in the countryside if it would lead to the restoration of a heritage asset or a local vernacular building which would help to preserve the Welsh culture. In those circumstances the Plan should recognise that it may not be feasible or viable for the building to be occupied by a rural worker or function as an affordable dwelling.  The paragraph should be amended to read "Development in the open countryside will have to satisfy National Policy and TAN6 in relation to new rural enterprise dwelling or one planet development. In some cases, it may be acceptable to create a new dwelling or re-establish a previous dwelling in the open countryside if it involves the sensitive repair or refurbishment of a heritage asset that helps preserve local character or the Welsh culture. In line with Policy TAI9 in the future should there be no eligible occupier for a rural enterprise dwelling then it would be considered for occupation by those eligible for affordable dwelling, if it is viable to do so".

TAI 19 - Conversion of Traditional Buildings in Open Countryside

Rep ID	Name	Section	Туре	Summary of comment / Change(s) to the Plan
358	Mr Geoff Wood [2916]	POLICY TAI19	Object	Suggest that for part 2 of this policy, a viability test is introduced for the affordable criteria. The term 'sub-ordinate' should be deleted as this test is too onerous. Further, the structural test should not apply where repairing or refurbishing the structure would preserve a heritage asset.  Part 2 - amend to read "Subject to being viable, the development provides an affordable unit for the community's local need for an affordable dwelling or the residential use is an element associated with a wider scheme for business re-use;"  Part 3 - amend to read "The building is structurally sound or involves the repair or refurbishment of a heritage asset that helps to preserve local character and/or the Welsh culture"
605	Cadnant Planning (Mr Rhys Davies) [1366]	POLICY TAI19	Object	Restricting conversion of traditional buildings for residential use to provide local need affordable units is unviable and undeliverable given the increase in building/development costs for conversion schemes. This policy will fail on viability ground as it is inevitable that the affordable housing requirement cannot be delivered in conversion schemes.  We seek the following changes:  1. The requirement of affordable housing within conversion schemes should be removed.  2. The policy should allow for minor extensions to the building to enable the development.  3. The requirement to provide evidence that employment use of the building is not viable should be removed.
1422	NFU Cymru (Dafydd Jarrett) [3285]	POLICY TAI19	Object	The NFU would like to make the following general comments about the Development Management Policies included in the draft Plan.  Opportunities that would not prevent the following development:  * A mixture of housing including the right to develop old ruins not only for visitors but for the indigenous population to live in as well.
1833	Carter Jonas (Mr Chris Bell) [3072]	POLICY TAI19	Object	Policy TAI 19 places unreasonable restrictions on the conversion of traditional buildings in the open countryside. The reasons being:  (i) Conversion costs are higher for traditional buildings which can impact on viability for affordable housing.  (ii) consideration should be given towards listing status of the building.  (iii) Each settlement should be treated differently on the basis of concern regarding second homes / holiday homes.  (iv) No criteria for cases where compliant occupant cannot be found.

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				(v) Should restrict use to principal residence only as per Exmoor National Park.
				Need a revised policy with more flexibility to treat each proposal and settlement on a case by case basis.

### 7.5 - Natural and Built Environment

#### **Context and Introduction**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
319	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	7.5.1	Object	The Plan rightly highlights the importance of the natural environment both for its own intrinsic value but also through the sustainable use of natural resources. This opening section sets a very negative view of the natural environment. We suggest re-wording to reflect the positive approach taken elsewhere in the Plan. Delete the first bullet point and move the (current) fifth point to the beginning
	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	7.5.2	Object	For greater clarity and precision his paragraph should include reference to the habitats also listed in Section 42 of the NERC Act. Add "habitats and" to opening sentence of 7.5.2
320				
324	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	7.5.3	Support	We welcome the recognition given to the importance of green/blue infrastructure networks and suggest that reference is also made to the concept of buffer zones to further protect these features.
53	Oaktree Environmental Ltd (John Williams)	7.5.4	Object	The proposed designation of the area containing and surrounding Moel Tryfan quarry as a SLA represents a needless, additional layer of designation designed to preserve the landscape where sufficient provision in this regard already exists. Albeit that it combines two existing Landscape

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	[2594]			Conservation Areas to form proposed SLA area 07, it covers land already afforded sufficient protection by the RHL designation. The addition of another layer of landscape regulation may prove an obstacle to future development at the quarry, thereby potentially undermining the effectiveness of policies relating to economic development, support of the Welsh language and mineral extraction.  Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas.

### **Conserving and Enhancing the Natural Environment**

## **PS16 – Conserving and Enhancing the Natural Environment**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
165	Rod Dixon [2774]	STRATEGIC POLICY PS16	Object	This is listed as PS19 under 7.5 in the contents table.
				Change to PS16 in contents table.
	Ellesmere Sand & Gravel Company Limited [2686]	STRATEGIC POLICY PS16	Object	This policy lacks clarity as to where it applies e.g. (not all landscapes and biodiversity assets are of the same value). The policy should relate to the local level rather than repeat national policy. If it is considered to apply to mineral extraction sites suggest changes as set out below.
232				Suggest a hierarchy for assessing environmental effects of development proposals notwithstanding other policies in the development plan. There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.
	Lafarge Tarmac Trading Limited [2735]	STRATEGIC POLICY PS16	Object	This policy lacks clarity as to where it applies e.g. (not all landscapes and biodiversity assets are of the same value). The policy should relate to the local level rather than repeat national policy. If it is considered to apply to mineral extraction sites suggest changes as set out below.
233				Suggest a hierarchy for assessing environmental effects of development proposals notwithstanding other policies in the development plan. There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.
311	Cyfeillion LLyn (Mrs Sian Parri) [2871]	STRATEGIC POLICY PS16	Object	A specific reference to protecting the AONB should be included in line with the AONB Management Plan in line with the Countryside and Rights of Way Act 2000

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
325	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	STRATEGIC POLICY PS16	Object	NB These comments are intended for PS16 but there seems to be an error on the contents link of the online document which links this policy to PS19  We welcome policy PS16 and stress that the distinctive natural environment of Gwynedd and Anglesey includes rare, common and a suite of typical habitats and species.  We suggest that this policy and associated text also includes reference to buffer zones to further protect green and blue infrastructure (point 5)
343	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	STRATEGIC POLICY PS16	Support	We welcome this policy and stress that the distinctive natural environment of Gwynedd and Anglesey includes rare, common and a suite of typical habitats and species. We suggest that this policy and associated text also includes reference to buffer zones to further protect green and blue infrastructure (point 5)  NB There seems to be an error on the contents link of the online document which links this policy to PS19
459	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS16	Support	Bourne Leisure endorses PS16 in principle as it seeks to conserve and enhance the natural environment.
493	Mr Glyn Jones [2971]	STRATEGIC POLICY PS16	Object	Stronger policy for AONB as regards requirement for appropriate level of Landscape and Visual Impact Assessment for proposed development and requirement to contact relevant landscape / planning officer for the authority to provide guidance on level of LVIA that is required.
802	Ty Mawr West Itd (John Hill) [3062]	STRATEGIC POLICY PS16	Object	My client wishes to repeat his strongly held views that to designate the Nantlle Valley as a Special Landscape Area would be detrimental to the local economy which factor should be borne in mind in the detailed consideration of the possible adverse effects of such designation.
805	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	STRATEGIC POLICY PS16	Object	AONB Management Plan - this is a statutory plan and it is believed that reference should be made to it in the relevant policies.
806	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	STRATEGIC POLICY PS16	Object	AONB - there is no specific policy in terms of maintaining and safeguarding the AONB. Rather, there are general policies and a reference to national legislation and policy. It is believed that a specific policy is required to maintain and retain the AONB, similar to Policy B8 in the current plan.
812	Bangor Civic Society 1 (Don	STRATEGIC POLICY PS16	Support	Bangor Civic Society wish to support PS16

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Mathew) [2988] Friends of Borth-y	STRATEGIC	Object	Conserving and enhancing the natural environment is a policy that we strongly support. We are not
891	Gest (Tom Brooks) [3036]	POLICY PS16		comfortable that the sites of local importance to Borth-y-Gest, namely the local nature reserves of Parc y Borth and Pen y Banc, and their adjacent ecological continuums are identified appropriately, in accordance with AMG4 local biodiversity conservation.
091				Table 23 is an important schedule of nature conservation designations but it makes no reference to local or non-statutory nature reserves and believe that this omission should be rectified. More over the constraints map is too indistinct to identify features definitively, but it is uncertain that Parc y Borth is clearly identified as a LNR and Pen y Banc is not and would like the omission corrected.
	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS16	Support	Bourne Leisure endorses PS16 in principle as it seeks to conserve and enhance the natural environment. The exceptional natural environment of Gwynedd, comprises the key visitor attraction of the area and therefore the desire to protect and where possible enhance the natural environment is supported by Bourne Leisure. Indeed the Destination Management Plan 2013-2020 states that 54% of visitors visited Gwynedd because of the scenery/landscape.
898				Greenacres and Hafan y Môr holiday parks are both located in environmentally sensitive locations. Bourne Leisure comments that this should not rule out development at these sites providing that the development is appropriate to the location and that commensurate mitigation measures can be implemented to mitigate both direct and indirect impacts.
				Bourne Leisure would like to stress that not all development has the potential to negatively impact on key landscape, public views and open spaces.
900	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGIC POLICY PS16	Object	The AONBs are given an inappropriately low emphasis in the JLDP draft in comparison with the GUDP. There should be a much more explicit and positive local commitment to the statutory duties to protect nationally designated landscapes and their settings, in line with SP2, B8 and B14 in the GUDP. Explicit reference should be made to the AONB Management Plans.
1092	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	STRATEGIC POLICY PS16	Object	With regards to Policy PS16 and AMG4 NRW questions the need for both these policies and if they should be incorporated into a single 'Biodiversity' Policy. A single policy, similar to Policy NTE/3 in the Conwy LDP, would provide the policy structure for safeguarding species of European, National and local importance as well as referring to the need to achieve the targets of the LBAP. The policy should include a hierarchy that clearly defines the level of protection afforded to sites and species and include reference to species included within Section 42 of the Wildlife and Countryside Act 1991 which the Authority has a duty to protect under the NERC Act (2006).
1182	Horizon Nuclear	STRATEGIC	Object	There is a typographical error in the introduction: It should be "effect", not "affect".

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Power (Miss Sarah Fox) [2919]	POLICY PS16		Horizon submits that greater flexibility needs to be included in these policies so that proposals predicted to have an adverse effect will be permissible subject to the identification and implementation of sufficient mitigation measures, supported by an appropriate implementation plan. Rather than seek specific amendments to these policies Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine its associated development applications.
1423	NFU Cymru (Dafydd Jarrett) [3285]	STRATEGIC POLICY PS16	Object	NFU Wales would like to make the following general comments about the Development Management Policies included in the draft Plan. The Plan should promote a high quality landscape acknowledging that agriculture has to play in it.
1439	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	STRATEGIC POLICY PS16	Object	The possible impact of development on the favourable conservation status of protected species needs further consideration. Species present in Gwynedd and Ynys Mon include otters, bats and water voles. Relevant policies should ensure that proposed development assessed under the provisions of the Plan and on allocations give proper and full consideration to protected species in order to comply with relevant legislative requirements.
1443	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	STRATEGIC POLICY PS16	Object	A number of the allocated sites are located within, adjacent or in close proximity to the Llŷn and Ynys Môn AONBs. We remind you of the Authority's duty under Section 85 of the Countryside and Rights of Way Act 2000, which requires public bodies to have regard to the purpose of conserving and enhancing the natural beauty of an AONB. It is considered that where an allocation has the potential to significantly affect the AONB and its associated boundary area, the site would need to be rigorously assessed in terms of adverse impact on the amenity and special qualities of the AONB.
1444	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	STRATEGIC POLICY PS16	Object	Some allocations are located within or adjacent to landscapes that are registered by CADW as Landscapes of Historic Interest. While this isn't a statutory designation, Chapter 6 of Planning Policy Wales identifies that it should be a material planning consideration in the planning process and must be given due regard.
429	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	STRATEGIC POLICY PS16	Object	

### AMG1 – Special Landscape Areas

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
54	Oaktree Environmental Ltd (John Williams) [2594]	POLICY AMG1	Object	The SLAs identified on the Proposals Map overlap other landscape designations which appear to have the same purpose of landscape protection. Where such overlap occurs, consideration should be given to reducing the extent of the SLA in order to avoid duplication of designated areas. In terms of our client's site, which is contained within proposed SLA 07,the landscape is characteristic of the mineral extraction industry in the area and should not be an excessive burden on the future extraction of mineral in the area
234	Ellesmere Sand & Gravel Company Limited [2686]	POLICY AMG1	Object	Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas.  There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.  The policy should be amended to include the words "long-term" effects thus allowing for mineral extraction in the interim and refer to restoration proposals being "in accordance" with the "long-term" objectives of the protection of special landscape areas.
235	Lafarge Tarmac Trading Limited [2735]	POLICY AMG1	Object	There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.  The policy should be amended to include the words "long-term" effects thus allowing for mineral extraction in the interim and refer to restoration proposals being "in accordance" with the "long-term" objectives of the protection of special landscape areas.
291	Mr Myrddin Roberts [2858]	POLICY AMG1	Object	The officers who are drawing up the new Joint Local Development Plan have not adequately involved local stakeholders such as community councils, farmers, landowners and residents before designating Special Landscape Areas on the map of Anglesey especially for the SLA named Beaumaris Wooded Slopes and Llangoed Vale. I happen to be the current chairman of Llanddona Community Council, so I know that no officer has attended any of our meetings. We as residents, should have been alerted to this proposed major change in policy. Meaningful dialogue, outlining the implications on businesses, land and homes has not happened.  That Policy AMG1 be deleted until such time that all stakeholders have been informed of the proposed introduction of SLA's and discussion and agreement reached by all relevant parties,
365	Dr Morag McGrath [231]	POLICY AMG1	Object	especially the local community and officers of the Joint Development Plan.  It is difficult to see how any development can 'add' to the historical, visual, geographical, ecological and cultural features of an SLA.

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				Change the wording to 'maintain, enhance or restore the recognised character and qualities' as in 7.5.10.
375	Welsh Highland Railway (Mr Graham Farr) [254]	POLICY AMG1	Support	The Company supports the Policy as worded. See the Company's separate representation in respect of the area to which it applies.
460	Bourne Leisure Ltd [2768]	POLICY AMG1	Object	Bourne Leisure considers that AMG1 should explicitly set out that due to the need for tourism facilities to be located near the coast there is a high probability that they will also be located in a SLA. Tourist facilities are in a constant state of change, with redevelopment and site rationalisation taking place at all times, to meet the needs of the dynamic tourism market. Bourne Leisure considers that even for sites located in the SLA, appropriate development can come forward providing that commensurate mitigation measures can be implemented to mitigate both direct and indirect impacts.
609	Mr Paul Madden [3032]	POLICY AMG1	Object	The whole of Anglesey was identified under policy 31 of the Ynys Môn Local Plan as a Special Landscape area (SLA). In the emerging Plan only a few areas are identified as an SLA and the criteria now used could apply to the whole island being a SLA. Anglesey could be awarded an enhanced global geopark status which is of equivalent status to a world heritage site. It does not offer sufficient protection against unsuitable development and reverses longstanding policy without adequate justification. Anglesey as a whole should be designated as a SLA.
808	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	POLICY AMG1	Object	In some places, this area (Western Llŷn SLA) abuts the AONB and protects the setting of the AONB. However, some parts of the AONB are not protected in this way. Therefore, it is believed that reference should be made to safeguarding the setting of the AONB in the relevant policies.
811	Cyngor Cymuned Botwnnog (Mrs Gwenda Roberts) [1541]	POLICY AMG1	Object	The New Coastal Landscape Conservation Area Scheme once more limits the rights of the residents of Pen Llŷn by preventing them building houses in their own area. The countryside will die as a result and depopulation can be expected - if it comes to that the unique culture and traditions of the countryside will be lost forever. Won't the Council regret losing such a valuable resource?
880	Mr John Tripp [252]	POLICY AMG1	Support	Delighted to see 5 new conservation areas in Anglesey.
892	Barton Willmore (Mr Mark Roberts) [1645]	POLICY AMG1	Object	This policy seeks to ensure that development within SLAs has "no detrimental impact on the landscape" This test and requirement is overly onerous and disproportionate to the SLA status. Also practically impossible in delivering any development not to have an impact of some form on the landscape.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Significantly the policy as drafted requires "no detrimental impact on the landscape" and does not embody the presumption in favour of sustainable development, as required by PPW.  Reference should be made to the presumption in favour of sustainable development.  Reference to "no detrimental impact" should be deleted and replaced with "no significant impact" and a further balance provided in that any impact may be outweighed by the positive effects of the development.
	Bourne Leisure Ltd [2768]	POLICY AMG1	Object	AMG1 allows development to come forward as long as its scale and nature is appropriate and that there is no detrimental impact on the landscape.
				Policy AMG1 therefore provides a positive policy basis for appropriate development come forward in the SLAs.
899				Bourne Leisure would like to stress that not all development has the potential to negatively impact on key landscape, public views and open spaces.
				Bourne Leisure considers that AMG1 should explicitly set out that due to the need for tourism facilities to be located near the coast there is a high probability that they will also be located in a SLA. Tourist facilities are in a constant state of change, with redevelopment and site rationalisation taking place at all times, to meet the needs of the dynamic tourism market.
901	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY AMG1	Object	We support the new emphasis on local protection through the SLAs (AMG1). Their role as providing buffers to protect the settings of the AONB should be emphasised and reinforced by extending SLAs close to areas of AONB without that protection. The scope and intentions of AMG2 as distinct from AMG1 need clarification.
904	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY AMG1	Object	Clarify details of and reasons for proposed changes in Western Llŷn SLA compared to former Western Llŷn LCA near Abersoch and Pwllheli.
905	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY AMG1	Object	Provide for an SLA as a buffer area to protect the northern part pf the Llŷn AONB, comprising (for example) a 2km belt to form the southern backdrop of Yr Eifl and the Clynnog Hills.
906	Campaign for the Protection of	POLICY AMG1	Object	SLAs 8 and 9 protecting the south Menai Strait shore should be extended to include unprotected areas on the Gwynedd side of the Menai, between Foryd Bay and Felinheli, either side of the World

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Rural Wales (Mr Noel Davey) [1169]			Heritage site in Caernarfon. Apart from protecting a valuable and vulnerable local landscape, reinstating a former Landscape Conservation Area, their key role would be to provide a buffer for the Anglesey AONB on the north side of the Strait.
55	Oaktree Environmental Ltd (John Williams) [2594]	7.5.9	Object	There should be no need for additional protection if areas of land are already protected by other landscape designations which recognise the quality of the landscape concerned. Our client's site is a working quarry which is located in an area recognised for its historic landscape value and so designated. There should be no need to afford the area additional landscape protection when such already exists.  Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas.
56	Oaktree Environmental Ltd (John Williams) [2594]	7.5.10	Object	Where landscape protection already exists, development proposals should already be required to give consideration to maintaining, enhancing or restoring the recognised character and quality of the areas. Conferring SLA status to such areas is therefore an unnecessary exercise which serves little purpose given the existing level of landscape protection.
426	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	7.5.10	Object	Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas  We support this policy to safeguard Special Landscape Areas. But in our opinion, Cwmorthin should be included amongst these. This area is certainly one which is incredibly striking and beautiful, and deserves to be specifically protected.
275	Mr Myrddin Roberts [2858]	7.5.11	Object	No discussions have taken place with the relevant Community Councils and landowners in respect of the new SLA named Beaumaris Wooded Slopes and Llangoed Vale. Surely all interested parties should have been made aware of this new designation and its implications on their businesses, land and homes. This major change and addition to planning policy merits more stakeholder input. It is insufficient to state that this is the time for public comment when we have not had detailed information readily available and had the necessary discussions with members of the Joint Development Plan.

# AMG2 – Protecting and Enhancing Features and Qualities that are Unique to the Local Landscape Character

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
236	Ellesmere Sand & Gravel Company Limited [2686]	POLICY AMG2	Object	There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects. Suggest duplication with Policy AMG1.
				The policy should be amended to include the words "long-term" effects thus allowing for mineral

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				extraction in the interim and refer to restoration proposals being "in accordance" with the "long-term" objectives of the protection of special landscape areas. Suggest potential merge with Policy AMG1.
237	Lafarge Tarmac Trading Limited [2735]	POLICY AMG2	Object	There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects. Suggest duplication with Policy AMG1.  The policy should be amended to include the words "long-term" effects thus allowing for mineral
				extraction in the interim and refer to restoration proposals being "in accordance" with the "long-term" objectives of the protection of special landscape areas. Suggest potential merge with Policy AMG1.
330	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY AMG2	Object	SLA are adequately covered by AMG1, for greater clarity AMG2 should be re-worded to protect the wider landscape and the important characteristic features of the local landscapes of Gwynedd and Anglesey. Remove reference to SLA and ensure policy relates to wider landscape.
809	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	POLICY AMG2	Object	It is a praiseworthy but slightly complicated policy, and it is believed that it could be difficult to put into operation.
886	Friends of Borth-y Gest (Tom Brooks) [3036]	POLICY AMG2	Support	Policies AMG2, AMG3 and AMG4 related to features and qualities that are unique to the local landscape, coastal protection and local biodiversity conservation.  We support these policies which are in line with the objectives of the Friends of Borth-y-Gest.
893	Barton Willmore (Mr Mark Roberts) [1645]	POLICY AMG2	Object	The policy does not set a qualifying requirement that impacts need to be "significant". It merely requires an adverse impact. This is not appropriate as any development may be deemed to have an adverse impact in some form on the landscape.  Furthermore, the policy does not allow the balancing of the economic, social or indeed other environmental benefits of a project (remediation and demolition of a contaminate site and large buildings), compared to the landscape impact arising from a small scale development.  Reference should be made to the presumption in favour of sustainable development.  The policy should be revised to require landscape impacts to be significant in undesignated areas and for these to significantly and demonstrably outweigh the economic, social or other environmental benefits before an application is refused on the basis of this policy.
1445	Cyfoeth Naturiol Cymru / Natural Resource Wales	POLICY AMG2	Object	We would recommend that this policy name is changed to protecting and enhancing features and qualities that are 'distinctive or special' to the landscape character rather than 'unique'.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	(Ymgynhoriadau Cynllunio) [1521]			
1446	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY AMG2	Object	Criterion 3 should be amended to read "layout of settlements and boundary types".
57	Oaktree Environmental Ltd (John Williams) [2594]	7.5.12	Object	The area containing our client's site is protected by a historic landscape designation considered sufficient to maintain the unique scenery and sense of place. It is ironic that further development at the quarry may be affected by protection of landscape characteristics that would not have existed but for the mineral extraction industry. The Nantlle Valley is renowned for its slate quarrying heritage and, in an area where good quality jobs may be scarce, extraction and processing of slate provides the basis for job creation to retain local populations in an industry that characterises the area in landscape and cultural terms.
				Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas.

#### **AMG3 - Coastal Protection**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
810	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	POLICY AMG3	Object	The Heritage Coast is a local designation that largely follows the AONB's coastal boundary in Llŷn. It is believed that this policy should reflect the designation in a more positive manner through further conserving the HC.
887	Friends of Borth-y Gest (Tom Brooks) [3036]	POLICY AMG3	Support	Policies AMG2, AMG3 and AMG4 related to features and qualities that are unique to the local landscape, coastal protection and local biodiversity conservation.  We support these policies which are in line with the objectives of the Friends of Borth-y-Gest.

# AMG4 – Local Biodiversity Conservation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
238	Ellesmere Sand & Gravel Company Limited [2686]	POLICY AMG4	Object	Suggest the policy is repetitive of national policy, unwieldy and requires flexibility in the wording as no definition or hierarchy is set out in regard to mineral extraction sites.  Would suggest merge with Policy AMG5 and change in wording to first sentence to read "Proposals should where appropriate protect and enhance biodiversity that has been identified as being important to the local area."
239	Lafarge Tarmac Trading Limited [2735]	POLICY AMG4	Object	Suggest the policy is repetitive of national policy, unwieldy and requires flexibility in the wording as no definition or hierarchy is set out in regard to mineral extraction sites.  Would suggest merge with Policy AMG5 and change in wording to first sentence to read "Proposals should where appropriate protect and enhance biodiversity that has been identified as being important to the local area."
333	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY AMG4	Support	We welcome the protection given to local biodiversity through this policy
462	Bourne Leisure Ltd [2768]	POLICY AMG4	Object	Point 1 should be amended to state that only alternative sites that are reasonably related to the application site should need to be considered to satisfy this policy. Point 2 should be amended to acknowledge that some developments already exist within areas of international, national and local biodiversity importance. Further development at these locations should be permitted as long as biodiversity is protected and enhanced.
888	Friends of Borth-y Gest (Tom Brooks) [3036]	POLICY AMG4	Support	Policies AMG2, AMG3 and AMG4 related to features and qualities that are unique to the local landscape, coastal protection and local biodiversity conservation.  We support these policies which are in line with the objectives of the Friends of Borth-y-Gest.
897	Bourne Leisure Ltd [2768]	POLICY AMG4	Object	AMG4 does not provide a positive basis for appropriate development to come forward and could stifle appropriate development.  Point 1 should be amended to state that only alternative sites that are reasonably related to the application site should need to be considered to satisfy this policy. Bourne Leisure considers that it is inappropriate to assess alternative sites that are not reasonably related to the existing site.  Point 2 should be amended to acknowledge that some developments already exist within areas of international, national and local biodiversity importance. Further development at these locations should be permitted as long as biodiversity is protected and enhanced.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Bourne Leisure considers it important for Anglesey and Gwynedd to take a balanced, pragmatic approach with regard to development proposals that have the potential to affect biodiversity.  Bourne Leisure notes that specific developments also have the potential to generate net gain in biodiversity value through habitat creation.
1073	Welsh Government (Mr Mark Newey) [1561]	POLICY AMG4	Object	It requires further re-drafting. As drafted the policy seems overly onerous for the consideration of development proposals on local non-statutory nature conservation designations.
1440	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY AMG4	Object	We have not considered possible effects on all local or regional interests. Therefore, the possibility of adverse effects on such interests should not be ruled out, which would be relevant to your Authority's general duty to have regard to conserving biodiversity as set out in section 40 of the Natural Environment and Rural communities (NERC) Act (2006). This advice includes any consideration of the planned provision of 'linear' and 'stepping stone' habitats as defined in Article 10 of the Habitats Directive.
1675	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY AMG4	Object	With regards to Policy PS16 and AMG4 NRW questions the need for both these policies and if they should be incorporated into a single 'Biodiversity' Policy. A single policy, similar to Policy NTE/3 in the Conwy LDP, would provide the policy structure for safeguarding species of European, national and local importance as well as referring to the need to achieve the targets of the LBAP. The policy should include a hierarchy that clearly defines the level of protection afforded to sites and species and include reference to species included within Section 42 of the Wildlife and Countryside Act 1991 which the Authority has a duty to protect under the NERC Act (2006).

# AMG5 – Protecting Sites of Regional or Local Significance

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
164	Rod Dixon [2774]	POLICY AMG5	Object	Anglesey is likely to achieve UNESCO global Geopark status. This should be included as a protected area.
				Include UNESCO sites and Global Geoparks as protected areas.
192	Mrs Irene Stott	POLICY	Object	Anglesey is likely to achieve UNESCO global Geopark status. This should be
192	[2780]	AMG5		included as a protected area. Include UNESCO sites and Global Geoparks as protected areas.
240	Ellesmere Sand &	POLICY	Object	The policy should look more positively toward mineral extraction development and support existing
240	Gravel Company	AMG5		sites and extensions to existing sites over new development.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Limited [2686]			Suggest potential merge with Policy AMG4 to allow for Ecological Assessment to support development of sites.
241	Lafarge Tarmac Trading Limited [2735]	POLICY AMG5	Object	The policy should look more positively toward mineral extraction development and support existing sites and extensions to existing sites over new development.  Suggest potential merge with Policy AMG4 to allow for Ecological Assessment to support
				development of sites.
	North Wales Wildlife Trust (Mr	POLICY AMG5	Object	We welcome the support given to sites of regional or local importance.
338	Chris Wynne) [2626]	7111100		However we suggest that the second paragraph starts with "if" rather than "when".
889	Friends of Borth-y Gest (Tom Brooks) [3036]	POLICY AMG5	Object	We would wish AMG5, which makes specific reference to local nature reserves, made reference to a table in which such reserves were listed.
890	Barton Willmore (Mr Mark Roberts) [1645]	POLICY AMG5	Object	This policy seeks to protect areas identified in the Plan for their ecological interest.  Note that land at the former Dynamex Friction Site, is identified as being within a Wildlife Site (WS) Plas Brereton but is subject to significant levels of contamination requiring remedial works. The policy as drafted does not allow for standard mitigation techniques to be employed to deal with any wildlife or habitats on the site which would be subject to demolition or remediation works.
				The Policy therefore does not comply with Test of Soundness C2 as it does not comply with Planning Policy Wales & CE2 as it is not realistic having regard to other alternatives. The policy should be re-written to allow on-site mitigation or other techniques to be utilised as is common practice on previously developed sites and non-statutory protected wildlife sites.

# **Preserving and Enhancing Heritage Assets**

#### **Context and Introduction**

Rep   Name   Section   Type   Summary of Representation / Change(s) to Plan
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Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
487	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	7.5.28	Object	What about locally important buildings (local listing?) and or regionally significant monuments, sites or other assets?
501	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	7.5.30	Object	It is worth specifying that Cadw and the Gwynedd Archaeological Trust will be consulted and are stakeholders / partners in this decision making process

## **PS17 – Preserving and Enhancing Heritage Assets**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
58	Oaktree Environmental Ltd (John Williams) [2594]	STRATEGIC POLICY PS17	Object	Reference to Candidate World Heritage Sites is unnecessary as no World Heritage status will apply to them. It would rather be more practical to change the text referring to specific world heritage sites (criterion 4) to cover World Heritage Sites in general so that if a candidate site is confirmed, it would automatically be covered by criterion 4. To include a specific criterion for candidate sites serves little purpose, given that they have little if any status. Interestingly, no reference is made in detailed policy AT1 to Candidate World Heritage Sites.  Re-draft policy to amend criterion 4 to offer coverage for World Heritage Sites in general as opposed to referring to specific sites and removal of criterion 5 which refers to Candidate World Heritage Sites.
242	Ellesmere Sand & Gravel Company Limited [2686]	STRATEGIC POLICY PS17	Object	The reference to "other areas of archaeological importance" at point one is not defined. Again this is considered a catch all policy.  Suggest removal of "other areas of archaeological importance" be removed from point one given the wide ranging scope and how this might inhibit mineral extraction development.
243	Lafarge Tarmac Trading Limited [2735]	STRATEGIC POLICY PS17	Object	The reference to "other areas of archaeological importance" at point one is not defined. Again this is considered a catch all policy.  Suggest removal of "other areas of archaeological importance" be removed from point one given the wide ranging scope and how this might inhibit mineral extraction development.
427	Cyngor Tref	STRATEGIC	Support	Ffestiniog Town Council supports the effort to acknowledge the slate areas as a Heritage Site of the

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Ffestiniog (Mrs Ann Coxon) [2940]	POLICY PS17		World. This would provide economic and social opportunities for these areas that would greatly benefit as a result. This is an excellent way to make the best of the area's natural resources. This would build on the strengths of the area and the County, giving Wales a special status.
649	Friends of Borth-y Gest (Tom Brooks) [3036]	STRATEGIC POLICY PS17	Object	Policies PS17 Borth-y-Gest contains a scheduled ancient monument which is indicated on the constraints map. The Seascape Character Area map referred to in the Deposit Draft includes for the Porthmadog Estuary a list of key scheduled ancient monuments which does not include the "Iron Age to Romano-British hut group" in Parc y Borth. Cadw have recently told us "The monument is of particular interest due to its survival in a lowland area where this type of earth constructed site is rare. It is of national importance for its potential to enhance our knowledge of prehistoric settlement practices. It is an important relic of the prehistoric landscape and retains significant archaeological potential. There is a strong probability of the presence of environmental and structural evidence, including preserved internal and external floor levels."  The principle document reference for the study of the site is "PARCYBORTH ARCHAEOLOGICAL RECORDING - G1764 - Report number: 484 - Prepared for Gwynedd Council - MAY2003.  We would wish the site to be specifically mentioned as an important heritage site feature.
692	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS17	Support	Noting very positive support for slate industry World Heritage Site bid.
695	Robert Llewelyn Jones [3058]	STRATEGIC POLICY PS17	Object	The need to do something to protect and make these Grade II listed buildings given to the public. They are at present closed to any tourist and locals wishing to have a casual look.  I wish to include these very special listed buildings into the plan. Strategic Policy PS 16/17 states that the aim of the plan is to safeguard the Plan area's history and landscape. This area does not appear to be part of our local authority's brief. It is not ring fenced or noted on the plan as being of such significance. I am requesting the area to be ring fenced and noted on the map of the area as being listed buildings.
696	Robert Llewelyn Jones [3058]	STRATEGIC POLICY PS17	Object	Asking for the Great Breakwater in Holyhead to be the same status as the two Heritage castles.  That the Constraints Map includes the Great Breakwater at Holyhead and that the building is given a higher profile alongside that of Beaumaris Castle and Caernarfon Castle due to its importance even today to the future of this Port of Holyhead - it is a living, working structure and has been since it was built over 150 years ago.
1183	Horizon Nuclear Power (Miss	STRATEGIC POLICY PS17	Object	Horizon submits that greater flexibility needs to be included in these policies so that proposals predicted to have an adverse effect will be permissible subject to the identification and

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Sarah Fox) [2919]			implementation of sufficient mitigation measures, supported by an appropriate implementation plan. Rather than seek specific amendments to these policies Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine its associated development applications.

## **National Development Management Policies**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
488	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	7.5.31	Object	It is worth noting that the archaeological resource is dynamic (as opposed to static) and is constantly developing. New archaeological sites are discovered all the time and new sites of national importance are added to the Schedule of Ancient Monuments as and when they have been assessed and their importance recognised.
653	Cyng/Counc R. LI. Jones [300]	7.5.31	Object	A more explicit explanation to the para. re 'no statutory requirement' and as to how effective the LDP is in protecting our heritage and listed monuments.  Clearer explanation of the statement as per page 182 and 'statutory requirement.
830	Robert Llewelyn Jones [3058]	7.5.31	Object	I am asking for the Constraints Map to show areas of Conservation - SPG plainly. I would not wish to have the same situation happen at Newry Beach again or at any other location on Anglesey. I would say that the Plan is unsound due to the lack of protection for the Conservation Area - Newry/Holyhead Beach.  It is very important for the Planning Committee to have easily read planning guidance and not to have to depend on officers to bring them to their notice. The Deposit Plan is not easily understood unless you are willing to spend a lot of time studying it. Make it more 'community friendly' - easily a common reference book for all.
489	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	7.5.32	Object	Developers should also take into account the regional HER when formulating proposals if they are to consider the undesignated archaeological resource / historic environment
658	Campaign for the Protection of Rural Wales (Mr	7.5.34	Support	We are glad to see the definition of setting as likely to be either limited or wide according to the particular location. This is sensible though it is as aspect of protection which is always going to be difficult to demonstrate. It is well to be prepared for debate.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Noel Davey) [1169]			Broad support, but some suggested areas for more detail or emphasis.
59	Oaktree Environmental Ltd (John Williams) [2594]	7.5.35	Object	A 'candidate' site may have little status other than that afforded by whatever current designation such a site may benefit from. Given our client's site is a working slate quarry within the proposed World Heritage Site application boundary, the weight attached to any application for World Heritage status should be commensurate with the stage reached in progressing the application.  Clarify what weight will be given to candidate site status when considering development proposals and whether that weight will increase as the World Heritage Site application progresses.

### AT1 – Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
673	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	7.5.37	Object	The content of the Assessment is not indicated in any detail. The possible impact on underlying remains and archaeological information should be remembered, alongside matters of style and materials.  Broad support, but some suggested areas for more detail or emphasis.

## AT3 – Locally or Regionally Significant Non-Designated Heritage Assets

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
362	Mr Geoff Wood [2916]	POLICY AT3	Object	In some circumstances, it may be appropriate to protect a heritage asset and / or preserve Welsh culture by bringing a building back into active use where the building is in a poor state of repair or is in a derelict state but still standing.  Amend part 1 to state "The sympathetic re-use and repair of redundant, derelict and under-used historic buildings and areas which are consistent with their conservation;"
495	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	POLICY AT3	Object	Interpretation, management, access, public engagement and other educational benefits should also be considered alongside reuse of historic buildings, archaeological sites, monuments and other historic assets

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
675	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY AT3	Object	The explanation to this policy is sensible and clear but the policy itself is poorly phrased and consequently not easy to understand. There is a bit too much about 'enhancement' which might result in the loss of true historic character if it was not made more clear that this is a conservation policy.  Broad support, but some suggested areas for more detail or emphasis.
499	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	7.5.43	Support	The archaeological resource is dynamic with new discoveries being made and reported regularly (over 2000 new records are added to the regional Historic Environment Record annually).

# AT4 – Protection or Non-Designated Archaeological Sites

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
244	Ellesmere Sand & Gravel Company Limited [2686]	POLICY AT4	Object	Mineral extraction sites by their very nature may have some effect on non-designated archaeological sites. The policy is considered too unwieldy, the words "may" and "potential" are not definitive.  Would suggest the policy is deleted and is covered by pre-application decision and the local list to requires and archaeological assessment where defined archaeological interest are located and/or cover by planning condition.
245	Lafarge Tarmac Trading Limited [2735]	POLICY AT4	Object	Mineral extraction sites by their very nature may have some effect on non-designated archaeological sites. The policy is considered too unwieldy, the words "may" and "potential" are not definitive.  Would suggest the policy is deleted and is covered by pre-application decision and the local list to require an archaeological assessment where defined archaeological interest are located and/or cover by planning condition.
494	Gwynedd Archaeological Planning Service (Mr Ashley	POLICY AT4	Object	Where the remains are not considered to be of national importance and their protection ('preservation in situ') is not considered appropriate (by the LPA and their archaeological advisors) then alternative mitigation ('preservation by record') will be the appropriate course of action in accordance with circular 60/96. Post-excavation, publication and dissemination of results must be

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Batten) [2959]			ensured with an emphasis on public benefit, particularly educational benefits to the local community.  All work should be in accordance with the standards set by the Chartered Institute for  Archaeologists
496	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	7.5.45	Object	Archaeological potential needs to be considered. Archaeological potential can often be inferred rather than just reacting to known archaeological sites. For example larger scale developments have the potential to reveal new archaeological information across landscapes where the current knowledge base might be limited. In these circumstances, even where there is limited existing evidence, archaeological evaluation may be required to establish an evidence baseline. Also, the archaeological resource is dynamic and the number, location, distribution of archaeological sites increases all the time.

## Waste Management

### PS18 – Waste Management

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
444	Mon a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	STRATEGIC POLICY PS18	Object	Strategic Policy PS18, and the associated policies, should make reference to waste minimisation and reduction strategies, reflecting targets in The Waste Prevention Programme for Wales. The JLDP should encourage or compel developers to avoid waste, and to re-use and recycle waste generated during the demolition and/or construction phase.
807	Ty Mawr West ltd (John Hill) [3062]	STRATEGIC POLICY PS18	Object	PS18 Waste Management. The waste hierarchy should include a provision for the appropriate use of suitable inert waste arising to be employed in the prudent restoration of previously disturbed land.
987	Welsh Slate Ltd [3147]	STRATEGIC POLICY PS18	Object	Whilst the Company supports the general strategy it is of the opinion that clear reference should be made to the use of suitable inert wastes in the restoration of previously disturbed land from whatever previous user.

# **GWA1 – Provision of Waste Management and Recycling Infrastructure**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
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Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
374	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY GWA1	Object	The Penygroes site includes land designated as a local WS, this should be removed from the development boundary. This would also provide a buffer between the waste site and adjacent river
492	Mon a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	POLICY GWA1	Object	The list of sites for waste management and recycling infrastructure should be reformulated to take account for the scope to embed within communities smart closed-loop waste management facilities, recognising the importance attributed to these facilities in "Towards Zero Waste" and the Municipal Sector Plan.
1447	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY GWA1	Support	NRW welcomes that this Policy allows for waste management facilities on some employment allocations.

#### **GWA2 – Waste Management Outside Development Boundaries and Allocated Sites**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
1448	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY GWA2	Object	GWA2, does not set out how the 7 year and 5 year trigger points in relation to the supply of landfill will be monitored and how the LPA will work with other Authorities to meet this need, if required. It is acknowledged that landfill has a diminishing role but the Plan should acknowledge the need for regional collaboration to meet the need for landfill across North Wales and how it will work with other authorities to meet this need. This should be set out in the policy to accord with TAN21.

### **GWA3 – Low and Very Low Level Radioactive Waste Treatment and Storage**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
615	Cyng/Counc R. Ll. Jones [300]	POLICY GWA3	Object	This policy is leaving the residents of Anglesey and Gwynedd in danger of becoming the dumping ground for radioactive waste, treatment and storage. The statement that low level radiation generated in existing businesses is made. Does this rule out the new nuclear plant that is being proposed or is it only our present Wylfa A that his applies to? Our County Council have not voted to store radioactive material on site and this should be made clear in the Policy GWA3.  Changes to Plan

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Clarification on the storage of nuclear waste and how the policies refer to the proposed Wylfa Newydd
796	Mr Rob Booth [3033]	POLICY GWA3	Object	Page 191 GWA3 is a policy for radioactive waste treatment and storage. This highlights one of the main problems of having a nuclear power station. The waste is extremely hazardous and difficult dangerous and had to store. The radioactive waste cannot be neutralized, when the half-life of Plutonium is 24,000 years.  Change to Plan There is a need for the definition of low level and very low level radioactive waste; what type of radioactive waste? I suggest that if this policy is retained it must lists which radioactive isotopes e.g. plutonium 239. If a radioactive waste is required to be stored it should be stored at the power station.

#### Minerals

#### PS19 - Minerals

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
246	Ellesmere Sand & Gravel Company Limited [2686]	STRATEGIC POLICY PS19	Object	Suggest hierarchy to support existing mineral extraction sites, then extensions to existing sites before new sites are considered. It is considered however the Council should maintain a MINIMUM 7 year land bank for Sand and Gravel at all times. Alternative restoration plans should be considered outside the traditional return to greenfield sites. Dormant and long inactive sites should be considered a potential valuable source of mineral that can be called upon when demand is high and a land bank is not fully available.  Promotion of existing mineral extraction sites and extensions to these sites should be promoted above any new sites. It is considered the Council should maintain a MINIMUM 7 year land bank for Sand and Gravel at all times and there should be a positive presumption toward mineral extraction particularly at existing sites. Actively encourage alternative after uses for mineral extractions sites over the return to greenfield where appropriate. Remove point 9.
247	Lafarge Tarmac Trading Limited [2735]	STRATEGIC POLICY PS19	Object	Suggest hierarchy to support existing mineral extraction sites, then extensions to existing sites before new sites are considered. It is considered however the Council should maintain a MINIMUM 10 year land bank of crushed rock at all times. Alternative restoration plans should be considered outside the traditional return to greenfield sites.
502	Gwynedd Archaeological	STRATEGIC POLICY	Support	restoration and aftercare needs to be considered in the context of the historically important quarries and historically significant slate tips for example

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Planning Service (Mr Ashley Batten) [2959]	PS19		
594	The Coal Authority (Mr James Smith) [2998]	STRATEGIC POLICY PS19	Object	Policy PS19 fails to make reference to potential proposals for hydrocarbons and unconventional hydrocarbons  Suggested Changes Reference should be made in Policy PS19 to the need for any proposals which come forward for conventional and unconventional hydrocarbons to be considered in accordance with national policies and guidance.
619	Mineral Products Association (Mr Malcolm Ratcliff) [1647]	STRATEGIC POLICY PS19	Object	this policy is in danger of confusing separate objectives of mineral planning by putting them under the general heading of supply and is thus unsound  We suggest the reordering of the policy as follows, The Councils will contribute to regional and local demand for a continuous, secure and sustainable supply of minerals by:  1. Maintaining a minimum 7 year land bank of Sand and Gravel and minimum 10 year land bank of crushed rock aggregate reserves throughout the plan period in line with national guidance.  2. Making provision for the production of dimension stone.  3. Making provision for the production of industrial minerals.  4. Maximising the use of secondary and recycled materials and mineral wastes for which appropriate provision will be made in land allocations  5. Acknowledging that where the principles of sustainable development can be achieved, the extension of existing quarries and/or new quarries is likely to be appropriate.  6. Requiring that where there is a need for new capacity of minerals, these should come from locations of low environmental constraint and take into account transport implications.  7. Minimising potential conflict between mineral and non-mineral land uses.  The Councils will safeguarding known / potential mineral resources from permanent development that would sterilize them or hinder extraction and protect maritime wharf and railhead facilities as a means of encouraging sustainable transport of aggregates.  The Councils will ensure good restoration and aftercare.  All Dormant and long-inactive minerals sites identified on the proposals map will be reviewed to assess their potential to contribute to the land bank and the likelihood of their re-opening. Where appropriate, Prohibition Orders will be served.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
659	Ty Mawr West Itd (John Hill) [3062]	STRATEGIC POLICY PS19	Object	PS19 Minerals -Slate Waste  The summary relating to the rail connection at Blaenau Ffestiniog does not portray the total facts of the matter. Yes there is a passenger rail connection but the rail infrastructure itself is unsuitable for the passage of heavy goods wagons which remedial works would require major expenditure

## **MWYN1 – Safeguarding Mineral Resources**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
248	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN1	Object	The policy is supported to ensure a steady and continued supply of aggregates. In order to comply with Mineral Planning Policy Wales the Council should maintain a MINIMUM 7 year landbank of sand and gravel at all times.  It is considered the Council should maintain a MINIMUM 7 year land bank for Sand and Gravel at all times and there should be a positive presumption toward mineral extraction particularly at existing sites.
249	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN1	Object	The policy is supported to ensure a steady and continued supply of aggregates. In order to comply with Mineral Planning Policy Wales the Council should maintain a MINIMUM 10 year landbank of crushed rock at all times. This would obviously be beneficial from existing quarries.  The Council should maintain a MINIMUM 10 year land bank of crushed rock at all times and there should be a positive presumption toward mineral extraction particularly at existing sites. Request that existing Sandstone and Dolerite Category 1 be included within the Safeguarding Area.
600	The Coal Authority (Mr James Smith) [2998]	POLICY MWYN1	Object	The Coal Authority considers that insufficient evidence has been provided to justify the omission of a Mineral Safeguarding Area covering the Caernarfon coalfield which does not appear to be located within an area covered by any International or National designations.  Change requested A Mineral Safeguarding Area covering the Caernarfon coalfield should be included on the Proposals Map.
620	Mineral Products Association (Mr	POLICY MWYN1	Object	Could not find any reference to Mineral Safeguarding Areas on either the Proposals Map or its Key. Consider the proposed criteria for assessing non-mineral development are incoherent.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Malcolm Ratcliff) [1647]			The deficiencies of the policy are that it does not specify a minerals report which should provide information on the quantity and quality of mineral potentially sterilised; it does not distinguish between forms of permanent development that pose a real risk to mineral sterilisation and those like minor applications, that do not; and it does not require that a statement of relative need between the mineral and the proposed development is submitted for the mpa to make a judgement of the planning balance.  Detailed replacement policy provided (see attachment)

# MWYN2 – Sustainable Supply of Mineral Resources

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
250	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN2	Object	There should be a positive policy presumption in favour of pursuing extensions to existing and new sites.  The policy should encourage sites to come forward with extensions to existing sites preferred over new sites.
251	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN2	Object	There should be a positive policy presumption in favour of pursuing extensions to existing sites.  The policy should encourage sites to come forward with extensions to existing sites preferred over new sites.
621	Mineral Products Association (Mr Malcolm Ratcliff) [1647]	POLICY MWYN2	Object	In view of the fact that the size of the landbank to be secured by policy is indicated in sufficient detail in policy PS19 we question whether this policy is necessary and is not a duplication. It thus fails soundness test CE1.  We suggest it is deleted.
321	Lafarge Tarmac Trading Limited [2735]	7.5.66	Object	The landbank requirement needs to be expressed as a minimum of 7 years for sand and gravel and a minimum of 10 years for crushed rock at all times through the plan and at the end of the plan. There is inference that no additional reserves in addition to the minimum landbanks would be consented.
378	Ellesmere Sand & Gravel Company Limited [2686]	7.5.66	Object	The landbank requirement needs to be expressed as a minimum of 7 years for sand and gravel and a minimum of 10 years for crushed rock at all times through the plan and at the end of the plan. There is inference that no additional reserves in addition to the minimum landbanks would be consented. The paragraph text should be amended to express landbank as a minimum of 7 years for sand and gravel and a minimum of 10 years for crushed rock at all times.

#### **MWYN3 - Preferred Areas of Search**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
252	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN3	Object	The preferred area of search at Bodychain, Llanllyfni is identified in the written policy but not on the proposals map. It should be shown on the proposals map. There is significant commercial potential for the resource and planning might reasonably be anticipated. It should therefore be a Preferred Area to be worked as an extension to Cefn Graiainog. This would potentially overcome the significant shortfall. The precise working area would be informed by EIA. The resource block at Llanllyfni and Cae Efa Lwyd, Penygroes is supported as an Area of Search.
348	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY MWYN3	Object	The preferred area of search to the north and north-west of Rhuddlan Bach quarry includes land within our ownership. We object to its inclusion with the AoS and note that the land is currently managed by us as part of and a buffer to the adjacent Cors Goch Ramsar site/SAC/SSSI/NNR. We would under no circumstances permit quarrying on our land.
622	Mineral Products Association (Mr Malcolm Ratcliff) [1647]	POLICY MWYN3	Object	This policy is deficient in confusing terminology mentioned in national policy. The objection is not to the sites listed but to the way they are referred to. The policy uses the term 'preferred areas of search'. This confuses two completely different and distinct types of mineral provision in Local Plans which it is important to maintain.  Suggested Changes At present we suggest the dropping of the word 'preferred' from areas of search to align more closely with national policy. However, whilst we ask for further clarification about the mineral site strategy we are unable to make any suggestions for changes at this time.
1812	Gwasanaeth Cynllunio Mwynau & Gwastraff Gogledd Cymru (Dafydd Gareth Jones) [2578]	POLICY MWYN3	Object	The mineral safeguarding areas (Policy MWYN1) do not appear on the proposal map on Gwynedd Council's website nor do the sand and gravel preferred areass of search referred to in policy MWYN 3.  Inconsistency with the preferred areas of search for sand and grain in Policy MWYN3 and Proposals Map 1.  Need to update the safeguarding mineral areas identified on Proposals Map 1.  Notation for some of the constraints maps is hard to interpret, e.g. safeguarding sand and gravel where the area crosses other denotations such as 'special landscape areas'.  Proposed Changes

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Need to include all preferred areas of search that have been identified for sand and gravel in Policy MWYN3 on Proposals Map 1, i.e. ensure that the following areas are marked on the proposals map as well as those that have already been included, namely; Bodychain Farm, Llanllyfni, Derwyn Fawr, Gandolbenmaen, Llecheiddior Uchaf, Gandolbenmaen.  Update the mineral sites identified on Proposals Map 1 to include Nanhoron Quarry and Nant Gwrtheyrn working mineral deposits. The situation also needs to be reviewed to include new back-up quarries (if approved), but also the practicality of including small sites such as Nant Gwrtheyrn and the submission of Prohibition Orders to recommence mining on any 'dormant' mineral site, e.g. Dorothea Quarry.  The mineral safeguarding areas (Policy MWYN1) need to be included on the interactive map as well all the sand and gravel preferred areas of search referred to in policy MWYN3.
314	Lafarge Tarmac Trading Limited [2735]	7.5.67	Object	There is a reasonable likelihood of the LDP failing to achieve a minimum 10 year landbank for crushed rock in Gwynedd. The recessionary 10 years upon which demand has been calculated is likely to be an underestimate. It does not reflect the major infrastructure projects identified in the RTS. The landbank calculation is flawed by combining slate with primary aggregates. Slate accounts for between 11.7% and 14.8% aggregates usage. The calculated landbank has a higher and disproportionate contribution from slate. The constraints on using slate as highlighted in the RTS have not been properly considered. Strategically important high Specification Aggregates require recognition.  Changes to Plan See suggested revised policy in attachment
372	Ellesmere Sand & Gravel Company Limited [2686]	7.5.68	Object	There may not be sufficient information to support allocations for Specific Sites. There is though sufficient information on Bodychain, Llanllyfni for it to be promoted as a Preferred Area.

## **MWYN4 – Mineral Developments**

	ep D	Name	Section	Туре	Summary of Representation / Change(s) to Plan
2	54	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN4	Object	Policy is overly prescriptive rather than supportive of mineral winning e.g. not all landscapes, biodiversity and other assets are of the same value. It applies a blanket protection of all assets. There is no consideration in the policy of the benefits of mineral extraction to local economy, employment or the restored environment.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
255	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN4	Object	Policy is overly prescriptive rather than supportive of mineral winning e.g. not all landscapes, biodiversity and other assets are of the same value. It applies a blanket protection of all assets. There is no consideration in the policy of the benefits of mineral extraction to local economy, employment or the restored environment.
503	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	POLICY MWYN4	Object	Screening and landscaping only where appropriate. Needs to be some recognition that quarry tips themselves are often of historic importance
505	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	POLICY MWYN4	Object	What is meant by 'environmental capacity'?
623	Mineral Products Association (Mr Malcolm Ratcliff) [1647]	POLICY MWYN4	Object	POLICY MWYN4: MINERAL DEVELOPMENTS  This policy is unsound because it fails soundness test CE1. The following criteria are the subject of objection,  1. We question whether the inclusion of odour in the list of amenity effects relates to minerals at all. Surely, this is limited to the deposit of waste?  7. We object to the inclusion of this criterion because we believe it is not needed since all aspects of the environment are already covered by other criteria in the policy ad it thus serves no useful purpose because an overall assessment of all environmental effects would be carried out in the determination process. It is moreover, notoriously difficult to define environmental capacity for all types of effects for which the concept is unsuited.  Changes to Plan  See suggested revised policy in attachment
875	Mr John Tripp [252]	POLICY MWYN4	Object	Criterion 2 - Safeguarding mineral assets. Use of slate waste. Restoration - legal and financial restraints (cite South Wales - open cast)
317	Lafarge Tarmac Trading Limited [2735]	7.5.71	Object	There is no recognition of the economic, social, employment benefits that can arise from mineral working. Or that minerals development can and often does result in a net benefit to biodiversity and other local assets. Acknowledgment is required that minerals working often makes a positive contribution to the local economy, habitats and the environment.
380	Ellesmere Sand & Gravel Company	7.5.71	Object	There is no recognition of the economic, social, employment benefits that can arise from mineral working. Or that minerals development can and often does result in a net benefit to biodiversity and other local assets.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Limited [2686]			
507	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	7.5.71	Object	The setting of Snowdonia National Park should also be considered in relation to proposals adjacent to the park.

# MWYN5 – Local Building Stone

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
624	Mineral Products Association (Mr Malcolm Ratcliff) [1647]	POLICY MWYN5	Object	we very much doubt that any building stone quarry operated to modern professional and sustainable standards can meet the requirements of the policy The policy as drafted does not in our opinion provide a realistic prospect to encourage new dimension stone operations, although it may allow continuation of existing ones. An application for more than a small operation (undefined) proposing to serve a wider market not limited to the heritage market by building a sustainable local business would undoubtedly fail. As would an application that produced material already available even if in tiny quantities from another site. There is no reason adduced that would justify such draconian and punitive conditions.  Changes to Plan We suggest the following changes to the policy The working or reopening of mineral operations to provide traditional building materials will be granted provided that: It is compatible with other Plan policies

### **MWYN6 – Buffer Zones Around Mineral Sites**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
258	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN6	Object	Buffer zone guidance is set out in Mineral Planning Policy Wales (2000) and the Aggregates Technical Advice Note (2004). Although for sand and gravel quarries 100m is the defined standoff from sensitive development this is defined as any building occupied by people on a regular basis and includes housing areas, hostels, meeting places, schools and hospitals where an acceptable standard of amenity should be expected. Where there is very limited impact from the mineral extraction site the 100m buffer zone may be reduced.
259	Lafarge Tarmac	POLICY	Object	Buffer zone guidance is set out in Mineral Planning Policy Wales (2000) and the Aggregates

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
	Trading Limited [2735]	MWYN6		Technical Advice Note (2004). Although for hard rock quarries 200m is the defined standoff from sensitive development this is defined as any building occupied by people on a regular basis and includes housing areas, hostels, meeting places, schools and hospitals where an acceptable standard of amenity should be expected. Where there is very limited impact from the mineral extraction site the 200m buffer zone may be reduced.
318	Jones Bros Ruthin [2911]	POLICY MWYN6	Object	The policy and justification should be simplified and revised, allowing for:  1 Where applied, Buffer zones to be set as the minimum necessary distances, on a case-by-case basis, given other related legislative control measures.  2 100 m buffer zones should also apply to extraction from hard rock mineral working deposits where no blasting is permitted, as MTAN1.  3 Extensions to mineral working operations, including working of mineral-working deposits, within defined buffer zones may be permitted in exceptional cases where it is shown that there would be no unacceptable impact on existing sensitive development.  4 Review and clarify the LDP map annotation.  Detailed replacement policies provided (see attachment)
602	The Coal Authority (Mr James Smith) [2998]	POLICY MWYN6	Object	The final paragraph of Policy MWYN6 appears to attempt to combine the issues of land instability arising from the legacy of coal mining and the potential for prior extraction of coal to avoid resource sterilisation with buffer zones around mineral sites. These are two distinct planning issues. The Coal Authority does not consider that the reference to land instability should be included within a policy relating to buffer zones around mineral sites.  Suggested Change The Coal Authority recommends that the last paragraph of Policy MWYN6 should be moved into
1813	Gwasanaeth Cynllunio Mwynau & Gwastraff Gogledd Cymru (Dafydd Gareth Jones) [2578]	POLICY MWYN6	Object	a new policy  The mineral safeguarding areas (Policy MWYN1) do not appear on the proposal map on Gwynedd Council's website nor do the sand and gravel preferred areas of search referred to in policy MWYN 3.  Inconsistency with the preferred areas of search for sand and gravel in in Policy MWYN3 and Proposals Map 1.  Need to update the safeguarding mineral areas identified on Proposals Map 1.  Notation for some of the constraints maps is hard to interpret, e.g. safeguarding sand and gravel where the area crosses other denotations such as 'special landscape areas'.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Proposed Changes Need to include all preferred areas of search that have been identified for sand and gravel in Policy MWYN3 on Proposals Map 1, i.e. ensure that the following areas are marked on the proposals map as well as those that have already been included, namely; Bodychain Farm, Llanllyfni, Derwyn Fawr, Gandolbenmaen, Llecheiddior Uchaf, Gandolbenmaen. Update the mineral sites identified on Proposals Map 1 to include Nanhoron Quarry and Nant Gwrtheyrn working mineral deposits. The situation also needs to be reviewed to include new back-up quarries (if approved), but also the practicality of including small sites such as Nant Gwrtheyrn and the submission of Prohibition Orders to recommence mining on any 'dormant' mineral site, e.g. Dorothea Quarry. The mineral safeguarding areas (Policy MWYN1) need to be included on the interactive map as well all the sand and gravel preferred areas of search referred to in policy MWYN3.

### **MWYN7 – Railhead and Wharf Facilities**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
260	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN7	Object	The policy should include all rail and wharf facilities related to the minerals industry (rather than just those identified on the Proposals Map) as sustainable modes of transport. Where it is justified that these facilities no longer have a commercially viable future alternative site uses will be supported.
435	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	POLICY MWYN7	Support	Ffestiniog Town Council also supports safeguarding the land at Rhiw for railway developments. If there was a way to develop a Conwy Valley railway line, there would be an opportunity to move waste slate from Blaenau Ffestiniog to be used as an aggregate, therefore avoiding the need to create new quarries and making these slates a new source of work and income for the town.

## MWYN8 – Exploration Works

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
261	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN8	Object	As the reasoned justification states mineral exploration works are considered permitted development under the Town and Country Planning (General Permitted Development Order) 1995.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Delete policy.
262	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN8	Object	As the reasoned justification states mineral exploration works are considered permitted development under the Town and Country Planning (General Permitted Development Order) 1995.  Delete policy.
1449	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY MWYN8	Object	It would be useful to know if unconventional fracturing is within scope of this policy. If yes then some flexibility built in to this policy would be welcome such as the policy will be reviewed in light of any new evidence on the potential impacts of these types of development on the environment.
508	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	7.5.80	Object	There is potential for such works to have an archaeological / historic environment impact which should also be considered.

#### **MWYN9 - Borrow Pits**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				Existing and proposed borrow pits can be a viable source of mineral that should be supported to ensure the sterilisation of mineral does not occur.
263	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN9	Object	Environmental benefits is a wide ranging statement and requires defining.
				Support the use of existing and proposed borrow pits where commercially viable given the temporary nature of development. Definition of the scope and extent environmental benefits.
				Horizon supports a policy on borrow pits.
1184	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY MWYN9	Object	However, rather than seek for specific amendments to policy MWYN9, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from these policies.

#### **MWYN10 – Restoration and After Care**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
264	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN10	Object	Restoration should explore different uses of the site alongside traditional restoration plans of returning the site to greenfield status particularly where the landform has changed significantly from its original form.
265	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN10	Object	Restoration should explore different uses of the site alongside traditional restoration plans of returning the site to greenfield status particularly where the landform has changed significantly from its original form. Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate.
315	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN10	Object	There should be encouragement for secondary or restoration uses of mineral working sites. Restoration offers significant opportunities for recreational, economic and employment uses that can bring long lasting local benefits after restoration.  The policy wording and the accompanying text requires to be adjusted to encourage alternative uses to be promoted.
352	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY MWYN10	Object	As a way of facilitating the implementation of other policies e.g. PS16 (point 5) and AMG 5, greater emphasis and priority should be given to the potential for natural recolonisation and enhancing or providing wildlife habitats
509	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	POLICY MWYN10	Object	There needs to be some recognition that quarry tips themselves are often of historic importance and restoration may not be appropriate or may at least need to be considered in this context.
592	The Coal Authority (Mr James Smith) [2998]	POLICY MWYN10	Support	The policy places a strong emphasis in achieving high standards of restoration and aftercare which the Coal Authority strongly supports. This will ensure that sites can be put to appropriate beneficial after use without future public safety issues arising from legacy.
381	Ellesmere Sand & Gravel Company Limited [2686]	7.5.82	Object	There should be encouragement for secondary or restoration uses of mineral working sites.  Restoration offers significant opportunities for recreational, economic and employment uses that can bring long lasting local benefits after restoration.

# **Section 8: Monitoring and Implementation**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	
361	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	8.1	Object	With reference to theme 5 we suggest further indicators are included to enable the impact of the Plan to be fully and accurately assessed. The trigger levels should also be adjusted to reflect the fact that NRW do not object on matters affecting locally important habitats or species.	
1065	Welsh Government (Mr Mark Newey) [1561]	8.3	Object	Further consideration should be given to the following areas of the framework:  * the phasing of the development sites, their delivery, relevant triggers and associated action points  * targets and triggers should be included to ensure that key factors are delivered.  * arrange the chart to ensure that the WG core output indicators relate to the local output indicator.  * where appropriate, amend core indicators to reflect local circumstances.  * Consider the implications of the recently published Sustainable Development Indicators to be collected from April 2013 onwards and the ongoing LDP Process Refinement Exercise should be considered	
1064	Welsh Government (Mr Mark Newey) [1561]	8.5	Object	It is unclear why the authority has decided to have two separate monitoring frameworks (para 8.5).	
479	Home Builders Federation Ltd (Mr Mark Harris) [1470]	8.8	Object	Theme 4 Indicator D26 Policy Target states: The rate of development does not exceed the 2,604 units in the 2011 to 2018 period. This appears to be a phasing policy which is not clearly stated in the policy sections of the document. We have objected to this elsewhere in our comments ID:130. Remove the split housing target which is effectively a phasing requirement.	
847	Mr Rob Booth [3033]	8.8	Object	I agree with the monitoring indicators for public transport (D4, D6,D7) however I disagree with the indicator D5 for a decrease on car journey times. Why is one of the indicators a decrease in journey times? The faster cars travel the more fuel they use and the more dangerous the journey. Also increases the likelihood of people using cars rather than buses. Also an indicator should be the public transport network is retained as it is or increased the number of buses has not declines, but increased. The times available for bus services are e.g. early morning and late buses enhanced.	

## **Appendices**

Re	ep O	Name	Section	Туре	Summary of Representation / Change(s) to Plan
47	'8	Welsh Highland Railway (Mr Graham Farr) [254]	Schedule of Key Documents	Object	The assessment of Candidate Site submission ref: SP870 appears to have been undertaken in isolation from that of closely related Candidate Site submission ref: SP552 (copies attached). The address should be the same (Welsh Highland Railway Ltd. trading as Welsh Highland Heritage Railway) and the proposed use also better described as

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan
				tourism. Access would be through that site, not independently of it. Should not the policy approach ' judging against the policy/criteria in the adopted development plan.' also be similar?
474	Mr Geraint Evans [2962]	Schedule of Settlements	Support	Re: Botwnnog - Field SP433: Agree with this potential site. Central to the village, direct access from the site either to the B4413 highway or to a quieter road before joining the B4413. A footpath already exists from this site all the way to the village centre and to both schools. Botwnnog is an ideal village to develop as there are so many facilities e.g. a primary and secondary school, a surgery, a shop, a cafe, a church and a chapel.
676	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	Schedule of Protected Sites or Areas	Object	Apart from in Appendix 7, there is no reference to the Landscapes of Outstanding Historic Interest and little to the Heritage Coast, both of particular importance to protecting the heritage of Western Llŷn.  The Heritage Coast and Landscapes of Outstanding Historical Interest should receive more mention.
363	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	Schedule of Proposed Supplementary Planning Guidance	Support	We support the inclusion of the SPG on Biodiversity but ask for clarification as to whether the Gwynedd SPG has been formally adopted by the Council. We note the proposal to revise, update and extend the SPG within 18 months of the Plans adoption
610	Mr Paul Madden [3032]	Schedule of Proposed Supplementary Planning Guidance	Object	Appendix 9 inadequately describes the existing SPGs which are currently in force and which in light of the new plan will need revising.  A full list would allow responders to refer to the SPGs to understand the implications of the plan on their contents.  Unclear if reference is made to the current SPG on Onshore Wind Energy which was subject to extensive consultation and comments in 2013. Its content should of have been acknowledged as feeding into the formulation of policy ADN1.  Need a full list of current SPGs and whether they are to be revised or be replaced.

### **General comments**

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563	Mr John E. Williams [3013]	General Comments	Object	In its present form the representation procedure is not accessible to a large number of Anglesey and Gwynedd residents. Some have neither the means or ability to access the

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				form on line and the form when accessed does not communicate at a level which they can comprehend. The form may well be acceptable to planning departments and energy companies but represents 'official speak' which the average person does not subscribe to. In that it need to fulfil a function as a consultation document it availability and the way it is laid out must be far more user friendly.
570	Angela Williams [3016]	General Comments	Object	The Plan is only available online and this is discriminatory. The important issue of tourism is omitted.  Changes: i) Information pack to every household by post ii) Application forms to be available at post offices iii) Freepost option iv) Potential adverse effects of having multiple wind turbines in 'tourist' areas must be included as a valid planning consideration.
595	Age Cymru Gwynedd a Mon (Stephen Williams) [3030]	General Comments	Object	We urge both Council's to ensure that due consideration is made to the commitment agreed in the Dublin Declaration and support the overarching aims identified in the Ageing Well in Wales programme when considering future planning and developmental policies in Anglesey and Gwynedd.
597	The Coal Authority (Mr James Smith) [2998]	General Comments	Object	The Coal Authority has reviewed the available documents and has identified a number of matters it would wish to see addressed.  Suggested Changes Full consideration should be given to areas of planning policy interest to the Coal Authority:  the safeguarding of coal in accordance with the advice contained in Minerals Planning Policy Wales and MTAN2 in Wales;  the establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in Minerals Planning Policy Wales and MTAN2 in Wales; and ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in Planning Policy Wales and MTAN2 in Wales.
665	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	General Comments	Object	Agricultural Sheds Summary - an explicit policy is required regarding agricultural sheds comparable to GUDP D9. Farmers need these, but they are large structures being built in increasing numbers in rural areas. Presently planning scrutiny of shed applications appears weak and more attention needs to be given to the siting, colouring and type of materials used.
748	Mr Rob Booth [3033]	General Comments	Object	Health Impact Assessment - this document fails to mention the potential main impact to health in the area which is the building of a new nuclear power station. The risk is not just to the current communities but the future population of the area. I would like to contest to the

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				completeness of this document because it does not include the possible impact of a nuclear disaster at the power station and during transport of radioactive waste.
756	Mr Rob Booth [3033]	General Comments	Object	Housing: there should be more housing that is part of a housing association. The policies should emphasize the requirement for social and mixed housing. All housing developments should include a proportion of social housing i.e. houses that belong to housing associations.
910	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	General Comments	Object	We find the JLDP draft less well structured, less concise and less coherent than the current GUDP in respect of presentation, emphasis and prioritisation of policies. Provide link to GUDP, including analysis of GUDP performance, reasons for changes in approach and emphasis. Provide additional, more specific but more concise policies for each type of planning development on model of GUDP. Improve style and presentation, proof check punctuation and grammar. Exclude jargon. Simplify language. Matrix relating relevant JLDP policies to each type of planning proposal.
971	Cyngor Cymuned Llanrug. (Mr Meirion Jones) [3134]	General Comments	Support	Llanrug Community Council is satisfied with the Plan.
1822	Mr Thomas Conway [3371]	General Comments	Object	The Deposit Plan is too large, impracticable and fragmented for public consultation. All the information for Anglesey and Gwynedd has been combined meaning the documents are extremely log. Both counties are different with different needs and need different policies to suit them. There is a lack of cross referencing within the documents and a representation form that is not fit for purpose. A 6 week consultation period is grossly inadequate, whilst available in libraries they are not open all of the time.